AFS # 4400300022 6X

COMMITMENT & INTEGRITY
DRIVE RESULTS

95 Cedar Street | Suite 100
Providence, Rhode Island 02903
www.woodardcurran.com

T 800.985.7897
T 401.273.1007
F 401.273.5087

CAA FPD
09/03/14

RECEIVED
AUG 21 2014
BY:

WOODARD
&CURRAN

August 8, 2014

EPA Region I
5 Post Office Square, Suite 100
Mail Code: OES04-2
Boston, MA 02109-3912
Attention: Air Clerk

Re: Amtrol, Inc. – MACT Subpart XXXXXX Initial and Compliance Notifications for AMTROL INC.

Dear Sir/Madam:

Enclosed are AMTROL INC.'s Initial Notification and Compliance Notification, required by the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 C.F.R. 63 Subpart XXXXXX).

If you have any questions or require additional information, please contact me at 273-1007 ext. 2016 (kcowan@woodardcurran.com) or Bob Perrotti of Amtrol at 535-1374 (bperrotti@amtrol.com).

Sincerely,

WOODARD & CURRAN, INC.

Kelly A Cowan

Kelly A. Cowan, P.E.
Project Manager

222224.15
Enclosures

cc: Bob Perrotti, Amtrol
Doug McVay, RIDEM Office of Air Resources, 235 Promenade St, Providence, RI, 02908

Initial Notification

National Emission Standards for Hazardous Air Pollutants:

Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

40 CFR 63 subpart XXXXXX

Section 1. Facility Information

X Yes, I am subject to 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Source category and NAICS code(s) 332313, Plate work manufacturing
332420, Metal tank (heavy gauge) manufacturing

Compliance Date: ☐ Existing source: July 25, 2011 X New source: 9-1-14
(Date of startup)

☐ No, I am NOT subject to 40 CFR Part 63 subpart XXXXXX. Reason not applicable:

If you checked the "No" box above, please complete only Section 1 of this form and then proceed directly to Section 3 of this form (skip Section 2).

Company name AMTROL INC.

Facility name (if different): Same

Facility (physical location) address: 1400 Division Road, West Warwick, RI, 02893

Owner name/title: Amtrol, Inc.

Owner/company address: 1400 Division Road, West Warwick, RI, 02893

Owner telephone number 401-884-6300

Owner email address (if available): Same

Is the Operator the same person as the Owner? Yes X No ☐

Section 2. Identification of Affected Operations

The following are the operations at this facility subject[b] to subpart XXXXXX (check all that apply):

Dry Abrasive Blasting Not Applicable		
	(1) Totally enclosed and unvented blast chambers	☐
	(2) Vented enclosures with a filtration control device	☐
	(3) Objects over 8 feet in any dimension without a filtration control device (includes outdoor blasting of objects over 8 ft in any dimension)	☐
Dry Machining Not Applicable		☐
Dry Grinding or Dry Polishing with Stationary Machines Not Applicable		☐
Spray Painting Not Applicable		
	(1) In a spray booth	☐
	(2) Without a spray booth (for Fabricated Structural Metal facilities or any objects over 15 feet)	☐
Welding		
	(1) Use less than 2,000 pounds of MFHAP-containing[b] welding rod or wire annually	☐
	(2) Use 2,000 pounds or more of MFHAP-containing[b] welding rod or welding wire annually	X

[b] ***Important Note:*** *These operations are affected sources under subpart XXXXXX* ***only if/when*** *they use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP).* ***MFHAP containing/potential*** *is defined to be when the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental of compounds of manganese.*

Section 3. Certification

I hereby certify that the information presented herein is correct to the best of my knowledge.

(Signature) 8-15-14 (Date)

Robert Perrotti, Paint & Environmental Manager (401) 535-1374

(Name/title) (Telephone No.)

AFS # 44003000022

OX

CAA FPD
0910314

Notification of Compliance Status

National Emission Standards for Hazardous Air Pollutants:

Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

40 CFR 63 subpart XXXXXX

RECEIVED AUG 21 2014 BY:

Section 1. Facility Information

X Yes, I am subject to 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Source category and NAICS code(s) 332313, Plate work manufacturing

332420, Metal tank (heavy gauge) manufacturing

Compliance Date: ☐ Existing source: July 25, 2011 X New source: 9-1-14 (Date of startup)

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If you checked the "No" box above, please complete only Section 1 of this form and then proceed directly to Section 3 of this form (skip Section 2).

Company name AMTROL INC.

Facility name (if different): Same

Facility (physical location) address: 1400 Division Road, West Warwick, RI, 02893

Owner name/title: Amtrol, Inc.

Owner/company address: 1400 Division Road, West Warwick, RI, 02893

Owner telephone number 401-884-6300

Owner email address (if available): Same

Is the Operator the same person as the Owner? Yes X No ☐

Section 2. Identification of Affected Operations

(a) **The following are the operations at this facility subject[b] to subpart XXXXXX (check all that apply):**

Dry Abrasive Blasting Not Applicable		
	(1) Totally enclosed and unvented blast cham bers	☐
	(2) Vented enclosures with a filtration control device	☐
	(3) Objects over 8 feet in any dimension without a filtration control device (includes outdoor blasti ng of objects over 8 ft in any dimension)	☐
Dry Machining Not Applicable		☐
Dry Grinding or Dry Polishing with Stationary Machines Not Applicable		☐
Spray Painting Not Applicable		
	(1) In a spray booth	☐
	(2) Without a spray booth (for Fabricated Structural Metal facilities or any objects over 15 feet)	☐
Welding		
	(1) Use less than 2,000 pounds of MFHAP-containing[b] welding rod or wire annually	☐
	(2) Use 2,000 pounds or more of MFHAP-containing[b] welding rod or welding wire annually	X

[b] ***Important Note:*** *These operations are affected sources under subpart XXXXXX* ***only if/when*** *they use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP).* ***MFHAP containing/potential*** *is defined to be when the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental of compounds of manganese.*

(b) **The following table lists each welding operation subject to subpart XXXXXX, noted previously in item (1) in Section 2:**

Welding Process Description / ID No.	HAP Emitted or Used[b] (Cd, Cr, Pb, Mn, Ni)	Compliance Methods Employed (Check all that apply)
Department 77	Cd, Cr, Ni, Mn	X Management practices X Fume capture device; describe *Existing internal-exhaust Smog Hog*
		☐ Management practices ☐ Fume capture device; describe
		☐ Management practices ☐ Fume capture device; describe
		☐ Management practices ☐ Fume capture device; describe
		☐ Management practices ☐ Fume capture device; describe
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		☐ Management practices ☐ Fume capture device; describe
		☐ Management practices ☐ Fume capture device; describe
		☐ Management practices ☐ Fume capture device; describe

(c) **The following applicable management practices are used at this facility, as practicable (check all that apply):**

Dry Abrasive Blasting

☐ Minimize dust generation during emptying of abrasive blasting enclosure to reduce MFHAP emissions, as practicable.

☐ Operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

☐ Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.

☐ Enclose dusty abrasive storage areas and holding bins, seal chutes and conveyors that transport abrasive materials.

☐ Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable

☐ Do not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size.

☐ When practicable, switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide).

Dry Machining, Dry Grinding, Dry Polishing

☐ Minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable

☐ Operate equipment according to manufacturer's instructions.

Spray Painting

☐ Proper cleaning and storage of spray guns, if applicable.

☐ Training for employees using HVLP spray equipment, with certification as having completed classroom or hands-on training in the proper selection, mixing, and application of coatings, with refresher training repeated at least once every 5 years.

Welding

X Operate equipment according to manufacturer's instructions.

X Use welding processes with reduced fume generation capabilities, if practicable. (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG))

☐ Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates, if practicable.

☐ Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation, if practicable.

☐ Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated, if practicable.

X Use a welding fume capture and control system, operated according to the manufacturer's specifications, if practicable.

Section 3. Certification of Compliance Status

X Yes, the facility referenced below **IS** operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

☐ No, the facility referenced below is **NOT** operating in compliance with the relevant standards And/or other requirements of 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Reason for noncompliance:

_____ _____

_____ _____

I hereby certify that the information presented herein is correct to the best of my knowledge.

(Signature) 8-15-14 (Date)

Robert Perrotti, Paint & Environmental Manager (Name/title)

(401) 535-1374 (Telephone No.)

AFS # 4400300022

6X

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CAA FAD
02/16/16

WOODARD
&CURRAN

January 22, 2016

RECEIVED
FEB 10 2016
BY:

Ruth Gold
RIDEM Office of Air Resources
235 Promenade St., Room 230
Providence, RI 02908

Re: Calendar Year 2016 Annual Compliance Certification for Amtrol, Inc. – Title V Permit RI-23-07(2)

Dear Ruth:

Enclosed is the Title V Annual Compliance Certification for Amtrol, Inc., located at 1400 Division Road, West Warwick, Rhode Island. As required by Condition II.X of Permit RI-23-07(R2), the report addresses compliance with each condition of the facility's permit during the 2016 calendar year.

This submission also addresses MACT certifications as follows:

- 40 C.F.R. 63 Subpart XXXX (RICE MACT) – Owners/operators of emergency engines are not required to submit deviation reports under the RICE MACT, but affected sources with Title V Operating Permits must report deviations in Title V compliance reports. Amtrol did not have any deviations from the RICE MACT requirements during 2014. Although the RICE MACT requirements have not yet been incorporated into Amtrol's Title V Operating Permit, Amtrol is providing this statement to ensure the RICE MACT deviation reporting requirements are met.
- 40 C.F.R. 63 Subpart XXXXXX (Welding MACT) – Owners operators of affected sources are required to submit annual compliance certifications, including any deviations from Welding MACT requirements. Amtrol did not have any deviations from the Welding MACT requirements during 2014. A copy of the annual certification form is attached.

If you have any questions on the report, please contact me at (401) 427-1323 or kcowan@woodardcurran.com or Bob Perrotti of Amtrol at (401) 535-1374 or BPerrotti@amtrol.com.

Sincerely,

WOODARD & CURRAN

Kelly A. Cowan

Kelly A. Cowan, P.E.
Project Manager

222224.18
Enclosures

cc: Air Compliance Clerk, Air Technical Unit, EPA-New England, Region 1, 5 Post Office Sq., Suite 100, Mail Code OES04-2, Boston, MA 02109-3912

Annual Certification & Compliance Report For Sources Reporting Visible Emissions Information
National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63 Subpart XXXXXX)

Section 1. Facility Information

Company name: Amtrol, Inc.

Facility name (if different): Same

Facility (physical location) address: 1400 Division Road, West Warwick, RI 02893

Responsible Official name: Christopher Laus

Responsible Official title: Senior Vice President of Operations

Responsible Official address: 1400 Division Road, West Warwick, RI 02893

Owner telephone number: 401-884-6300

Owner email address (if available): claus@amtrol.com

Is the Operator the same person as the Owner? ☑ Yes ☐ No

If the Operator information is different from the Owner, please provide the following:

Operator name/title: Same

Operator telephone number: Same

Operator email address (if available): Same

Section 2. Date of Report and Reporting Period

Date: January 22, 2016 Reporting Period: January 1, 2015 - December 31, 2015

Section 3. Visible Emission and Opacity Reporting

Tier 1 fugitive emission determinations (Method 22 - required for all sources):

☐ Not applicable. ☑ Tier 1 was applicable; provide a summary in the following table.

Date	Visible Emissions Detected? (Y/N)	Corrective Actions	Follow-Up
1/7/15	N	None Required	None Required
4/3/15	N	None Required	None Required
7/15/15	N	None Required	None Required
10/15/15	N	None Required	None Required

Tier 2 opacity determinations (Method 9 - required if fugitive emissions were detected during Tier 1 measurements):

☑ Not applicable. ☐ Tier 2 was applicable; provide a summary in the following table.

Date	Average of the 6-Minute Opacities Measured	Corrective Actions	Follow-Up

Section 4. Site-specific Welding Emissions Management Plan Reporting.

Tier 3 visual emission determinations (Required if 20% opacity is exceeded during Tier 2 measurements):

☑ Not applicable.

☐ Tier 3 was applicable; attach copies of daily visual determinations and the Site-Specific Welding Emissions Management Plan

Section 5. Changes to Facility Operations Since Last Report

☑ No, there have been no changes in or additions to the processes at my facility and/or applicable requirements under 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories since the last report.

☐ Yes, the following changes occurred at this facility with regard to the applicable requirements of 40 C.F.R. 63 Subpart XXXXXX.

Source/requirement that changed:_____

How my source/requirements changed:_____

Is the source currently in compliance? ☑ Yes ☐ No

If no, indicate reasons:_____

Section 6. Certification of Compliance Status

☑ Yes, the facility referenced below is operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

☐ No, the facility referenced below is not operating in compliance with the relevant standards And/or other requirements of 40 CFR Part 63 subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Reason for noncompliance:_____

I hereby certify that the information presented herein is correct to the best of my knowledge.

Signature

Feb 1, 2016
Date

Christopher Laus
Name/title

401-884-6300
Telephone No.