

# Iowa Department of Natural Resources

## Draft 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.

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

1. CURRIES Division of AADG, Inc., located at 1500 12th Street NW, Mason City, IA 50401 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Phil Meekins.
2. CURRIES Division of AADG, Inc. is a Metal Doors, Sash, Frames, Molding, and Trim Manufacturing facility. This facility consists of 37 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	96.87
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	96.87
Particulate Matter	PM	124.15
Sulfur Dioxide	SO <sub>2</sub>	0.08
Nitrogen Oxides	NO <sub>x</sub>	1.48
Volatile Organic Compounds	VOC	203.19
Carbon Monoxide	CO	11.29
Lead	Lead	0
Hazardous Air Pollutants <sup>(1)</sup>	HAP	86.55

<sup>(1)</sup> May include the following: See application.

3. CURRIES Division of AADG, Inc. submitted a Title V Operating Permit renewal application on October 23, 2023. 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.
4. 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.

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

1. The public comment period for the draft permit will run from March 7, 2024 through April 6, 2024. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. 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.
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 Zane Peters at the DNR 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.

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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.

## Title V Application Review Notes

Applicant:	<b>Curries Division of AADG, Inc.</b>
Parent Company:	Assa Abloy, Inc.
SIC Code:	3442
City:	Mason City
County:	Cerro Gordo
EQ#:	92-6755
Facility#:	17-01-087
Permit #:	00-TV-032R4
Reviewer:	Zane Peters
Date:	12/22/23

### **Facility Identification**

Facility Name:	<b>Curries Division of AADG, Inc.</b>
Facility Location:	1500 12 <sup>th</sup> St NW, Mason City, IA 50401
Responsible Official:	Phil Meekins
Phone:	641-494-2850

### **Background:**

Curries Division of AADG, Inc. has applied for a renewal of their Title V Operating Permit. One Title V Permit had been previously issued for the CURRIES Division of AADG, Inc. as all equipment had been moved to the 1500 12<sup>th</sup> St NW location (EQ number 92-6755; Facility Number 17-01-087). This permit includes equipment that was previously located at 1600 12<sup>th</sup> St NE (EQ Number 92-6759; Facility Number 17-01-087) and at 251 9<sup>th</sup> St SE (EQ Number 92-1229; Facility Number 17-01-035). The 12<sup>th</sup> Street facility currently consists of thirty-seven (37) significant units and twenty-one (21) insignificant emission units.

### **Title V Applicability**

<b>Pollutant</b>	<b>Major for Title V?</b>
PM <sub>10</sub>	<input type="checkbox"/>
SO <sub>2</sub>	<input type="checkbox"/>
NO <sub>x</sub>	<input type="checkbox"/>
VOC	<input checked="" type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input checked="" type="checkbox"/>
Total HAPs	<input checked="" type="checkbox"/>

**Program Applicability:**

- PSD: No.
- Part 61 NESHAP: No.
- NSPS: No.
- Major Source of HAP's: Yes
- Part 60 NSPS: Yes
  - 40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- Part 63 NESHAP: Yes
  - 40 CFR 63 Subpart Mmmm, National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
  - 40 CFR 63 Subpart Pppp, National Emissions Standards for Hazardous Air Pollutants for the Surface Coating of Plastic Parts and Products
  - 40 CFR 63 Subpart Zzzz, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- Acid Rain: No.
- Stratospheric Ozone Protection: No.
- Prevention of Accidental Releases: No.

**NESHAP Applicability by emission unit**

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>DNR Construction Permit Number</b>	<b>NESHAP Part 63 Applicability</b>
17	17	Ready Set Cure Oven	-	MMMM
C9-01-1	C9-01-1	CURRIstain Spray Booth #2 (Stain)	01-A-714-S5	MMMM
C9-07-1	C9-07-1	CURRIstain Spray Booth #1 (Primer)	07-A-1266-S2	MMMM
C9-07-2	C9-07-2	CURRIstain Spray Booth #3 (Sealer/Topcoat)	07-A-1267-S2	MMMM
C9-12-1	C9-12-1	Door Skin Adhesive Cure Oven	12-A-312	MMMM
C9-12-2	C9-12-2	Door Hand Paint Booth	12-A-334-S1	MMMM
C9-94-2	C9-94-2	Door Washer Process Burner #1 (Stage 1)	-	MMMM
C9-94-5	C9-94-5	Door Skin Adhesive Booth (D2 Cell)	97-A-562-S4	MMMM
C9-94-12	C9-94-12	Core Adhesive Booth #1	90-A-029-S5	MMMM
C9-94-13	C9-94-13	Core Adhesive Booth #2	97-A-565-S4	MMMM
C9-94-18	C9-94-18	Adhesive Cure Oven #1 (D2 Cell)	97-A-569-S3	MMMM
C9-96-6	C9-96-6	Adhesive Booth (D1 Cell)	97-A-571-S4	MMMM
C9-98-2	C9-98-2	Adhesive Rollcoater	04-A-1030-S4	PPPP
C12-03-1	C12-03-1	Line 2 Washer Burner #1 (Stage 1)	-	MMMM
C12-03-2	C12-03-2	Line 2 Washer Burner #2 (Stage 3)	-	MMMM
C12-03-3	C12-03-3	Frame Dry Off Oven	02-A-860-S1	MMMM
C12-20-1	C12-20-1	Frame Dry Off Oven	20-A-364	MMMM

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>DNR Construction Permit Number</b>	<b>NESHAP Part 63 Applicability</b>
C12-03-4	C12-E03-4	Door Paint Reciprocator #1	02-A-861-S8	MMMM
C12-03-5	C12-E03-5	Door Paint Reciprocator #2	02-A-862-S7	MMMM
C12-03-5-a	C12-03-5-a	Door Aerobell Reciprocator #1	18-A-368-S2	MMMM
C12-03-6	C12-03-6-a	Door Aerobell Reciprocator #2	02-A-863-S9	MMMM
C12-03-7A	C12-03-7A	Door Paint Cure Oven	02-A-864-S1	MMMM
C12-03-7B	C12-03-7B		02-A-865-S1	MMMM
C12-03-7C	C12-03-7C		02-A-866-S1	MMMM
C12-93-9	C12-93-9	Frame Paint Bake Oven	93-A-331-S2	MMMM
C12-93-10	C12-93-10		00-A-1009-S1	MMMM
C12-93-14	C12-93-14		00-A-1010-S1	MMMM
C12-93-15	C12-93-15		00-A-1011-S1	MMMM
C12-93-6	C12-E93-6	Frame Paint Reciprocator #1 (Line 1)	93-A-328-S12	MMMM
C12-93-7	C12-E93-7	Frame Paint Reciprocator #2 (Line 1)	93-A-329-S12	MMMM
C12-PSR-1	C12-PSR-1	Paint Storage Room 1	-	MMMM
C12-PSR-2	C12-PSR-2	Paint Storage Room 2	-	MMMM
GEN1	GEN1	20 hp Natural Gas Engine – Emergency	-	ZZZZ
GEN2	GEN2	201 hp Diesel Engine – Emergency	-	ZZZZ

### **Changes Since the Last Issuance**

#### **General Changes**

- Permit number and relevant permitting dates updated
- Permit Contact updated
- Supervisor of Air Operating Permits updated
- General Conditions Updated

#### **Emission Point Specific Changes**

- Insignificant Activities list updated
- EP C9-01-1 – Emission limits, operating limits, and emission point characteristics updated in accordance with DNR Construction Permit 01-A-714-S5 (pp. 10-13)
- EP C9-07-1 – Rated capacity, emission limits, operating limits, and emission point characteristics updated in accordance with DNR Construction Permit 07-A-1266-S2 (pp. 14-17)
- EP C9-07-2 - Emission limits, operating limits, and emission point characteristics updated in accordance with DNR Construction Permit 07-A-1267-S2 (pp. 18-21)
- EP C9-13-1 – REMOVED from the permit at the request of the facility in the renewal application package
- EP C9-94-5 - Emission limits, operating limits, and emission point characteristics updated in accordance with DNR Construction Permit 97-A-562-S4 (pp. 32-35)

- EP C9-96-6 – VOC limit and operating limits updated in accordance with DNR Construction Permit 97-A-571-S5 (pp. 45-47)
- EP C9-94-18 – Rated capacity, total organic HAP limit, operating limits, and emission point characteristics updated in accordance with DNR Construction Permit (44-46)
- EP C12-20-1 – New emission point added to the permit in accordance with DNR Construction Permit 20-A-364 (pp. 57-58)
- EP C12-03-4 – Emission limits and stack characteristics updated in accordance with DNR Construction Permit 02-A-861-S8 (pp. 59-62)
- EP C12-03-5 – Emission limits and stack characteristics updated in accordance with DNR Construction Permit 02-A-862-S7 (pp. 59-62)
- EP C12-03-5-a – Emission limits and stack characteristics updated in accordance with DNR Construction Permit 18-A-368-S2 (pp. 59-62)
- EP C12-03-6 – Emission limits and stack characteristics updated in accordance with DNR Construction Permit 02-A-863-S9 (pp. 59-62)
- EP GEN1 – New emission point added to the permit due to NESHAP applicability (pp. 78-80)
- EP GEN2 - New emission point added to the permit due to NESHAP applicability (pp. 81-83)

### **Periodic Monitoring/CAM**

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

According to the calculations submitted by the facility, no CAM plans are required for this renewal.

The following Emission Points require Agency Operation and Maintenance Plans:

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>
C9-01-1	C9-01-1	CURRIstain Spray Booth #2
C9-07-1	C9-07-1	CURRIstain Spray Booth #1
C9-07-2	C9-07-2	CURRIstain Spray Booth #3
C9-12-2	C9-12-2	Door Hand Paint Booth
C9-94-5	C9-94-5	Door Skin Adhesive Booth (D2 Cell)
C9-94-12	C9-94-12	Core Adhesive Booth #1
C9-94-13	C9-94-13	Core Adhesive Booth #2
C9-96-6	C9-96-6	Adhesive Booth (D1 Cell)
C12-03-4	C12-E03-4	Door Paint Reciprocator #1
C12-03-5	C12-E03-5	Door Paint Reciprocator #2
C12-03-5-a	C12-03-5-a	Door Aerobell Reciprocator #1
C12-03-6	C12-03-6-a	Door Aerobell Reciprocator #2
C12-93-6	C12-E93-6	Frame Paint Reciprocator #1 (Line 1)
C12-93-7	C12-E93-7	Frame Paint Reciprocator #2 (Line 1)
C12-99-1	C12-99-1	Fabrication Shop Dust Collector & Paint Room

The Agency Operation and Maintenance Plans require:

### **Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include an inspection of the condition of the filter material following the manufacturer's recommendations or standard facility practice.
- Maintain a written record of the observation and any action resulting from the inspection.

### **Recordkeeping and Reporting**

- Maintenance and inspection records will be kept for five years and available upon request.

### **Quality Control**

- The filter equipment will be operated and maintained according to the manufacturers' recommendations.

### **Stack Testing**

No stack testing is required at this time.

### **Notes**

- Emission points with C9 in their name were originally located at the 9<sup>th</sup> street facility and those points with C12 at the 12<sup>th</sup> street facility.
- EU-7 Paint Hook Cleaning Oven is on the insignificant list and is considered an incinerator; see IAC 22.103(2)"b"(3).
- EU's 10 (incorrectly listed as EU 10, actually EU C9-13-1), 17, C12-03-1, C12-03-2, C9-94-2, and C9-94-3 are erroneously listed on the insignificant activities list in the application. All of the emission units aside from C9-94-3 fall under NESHAP's (see IAC 22.101(1)"d"), with C9-94-3 having been removed in the previous application.
- EU 5 Paint Storage Rooms are incorrectly listed under insignificant activities, and are listed as EU's within the TV permit (due to MMMM applicability).
- EUs GEN1 and GEN2 are incorrectly listed under insignificant activities, and are listed as EU's within the TV permit (due to ZZZZ applicability).
- As referenced by a correspondence letter in compliance section files dated 03/9/17, subpart MMMM applicability for EP C9-98-2 in permit may not be needed since the facility has chosen to comply with subpart PPPP for the emission point. Since the facility wishes to maintain flexibility with this emission point, the MMMM applicability section is retained if the facility chooses to comply with MMMM instead of PPPP.
- Facility appears to be in compliance and on-schedule with variances listed in previous compliance certifications/inspection reports. All construction permit modifications specified in compliance plans submitted and incorporated into permit.