



State of Utah

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Environmental Quality

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DIVISION OF AIR QUALITY  
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DAQE-IN158670002-24

September 23, 2024

Rodney Slade  
Rockwell, LLC  
786 West Spring Creek Place, Suite #5  
Springville, UT 84663  
rodney@rockwellinc.com

Dear Mr. Slade:

Re: Intent to Approve: New Approval Order for a Composite Window Well Manufacturing Plant  
Project Number: N158670002

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Christine Bodell**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Christine Bodell, can be reached at (385) 290-2690 or cbodell@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager  
New Source Review Section

ADH:CB:jg

cc: Utah County Health Department

**STATE OF UTAH**  
**Department of Environmental Quality**  
**Division of Air Quality**

**INTENT TO APPROVE**  
**DAQE-IN158670002-24**  
**New Approval Order for a Composite Window**  
**Well Manufacturing Plant**

**Prepared By**  
**Christine Bodell, Engineer**  
**(385) 290-2690**  
**cbodell@utah.gov**

**Issued to**  
**Rockwell, LLC - Springville Window Well Manufacturing**

**Issued On**  
**September 23, 2024**



**New Source Review Section Manager**  
**Alan D. Humpherys**

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## GENERAL INFORMATION

### CONTACT/LOCATION INFORMATION

**Owner Name**

Rockwell, LLC

**Source Name**

Rockwell, LLC - Springville Window Well Manufacturing

**Mailing Address**

786 West Spring Creek Place, Suite #5  
Springville, UT 84663

**Physical Address**

786 West Spring Creek Place, Suite #5  
Springville, UT 84663

**Source Contact**

Name: Rodney Slade  
Phone: (801) 623-8002  
Email: rodney@rockwellinc.com

**UTM Coordinates**

446,818 m Easting  
4,448,411 m Northing  
Datum NAD83  
UTM Zone 12

**SIC code** 3089 (Plastics Products, NEC)

### SOURCE INFORMATION

**General Description**

Rockwell, LLC (Rockwell) is requesting a new AO for an existing composite window well manufacturing facility in Springville, Utah County. Rockwell uses a manufacturing process that uses polyester resin to create window wells for the construction market. The manufacturing process includes the use of polyester resin molds, curing ovens, and sanding and finishing operations.

**NSR Classification**

New Minor Source

**Source Classification**

Located in Southern Wasatch Front O3 NAA, Provo UT PM<sub>2.5</sub> NAA  
Utah County  
Airs Source Size: B

**Applicable Federal Standards**

None

**Project Description**

Rockwell was previously operating under UAC R307-401-9, Small Source Exemption, and is expanding operations. Rockwell uses a manufacturing process that uses polyester resin to create window wells for the construction market. The manufacturing process includes the use of polyester resin molds, curing ovens, and sanding and finishing operations.

Raw materials (parts) are measured and loaded into a mold. The mold is closed, and all emissions are evacuated via a vacuum pump. The part in the mold is then transferred to a curing oven. Once cured, the part is removed from the mold to be sanded and mounted. As part of the finishing process, an automotive clear coat is sprayed over the window well.

Emissions from the process primarily come from polyester resin in the production of the window well and from polyurethane clear coat and adhesive. The emissions from the resin come through vacuum pumps and are removed from the building by turbines. The emissions from the clear coat and adhesive come through a spray gun and are removed from the building by turbines. Both are filtered.

### **SUMMARY OF EMISSIONS**

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO <sub>2</sub> Equivalent		800.00
Carbon Monoxide		0.56
Nitrogen Oxides		0.67
Particulate Matter - PM <sub>10</sub>		6.84
Particulate Matter - PM <sub>2.5</sub>		2.45
Sulfur Dioxide		0.01
Volatile Organic Compounds		16.63

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Generic HAPs (CAS #GHAPS)		20
Styrene (CAS #100425)		10080
	Change (TPY)	Total (TPY)
Total HAPs		5.05

### **PUBLIC NOTICE STATEMENT**

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in The Daily Herald-Legal Advertising Department on September 25, 2024. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

## SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

## SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

### **II.A      THE APPROVED EQUIPMENT**

II.A.1	<b>Rockwell, LLC</b> Composite Window Well Manufacturer
II.A.2	<b>One (1) Paint Booth</b> Finishing booth equipped with high-volume low-pressure (HVLP) spray guns Controls: Fabric filter
II.A.3	<b>Eight (8) Polyester Resin Mold Stations</b> Controls: Vacuum system discharge to fabric filters and carbon filtration units

II.A.4	<b>Six (6) Curing Ovens</b> Maximum Rated Capacity: 0.1 MMBtu/hr (each) Fuel: Natural Gas
II.A.5	<b>Miscellaneous Process Boilers and Heaters</b> Maximum Rated Capacity: Less than 5.0 MMBtu/hr (each) Fuel: Natural Gas
II.A.6	<b>Sanding Equipment</b> Control: Six (6) box fabric filters

## SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

### **II.B        REQUIREMENTS AND LIMITATIONS**

II.B.1	<b>Site-Wide Requirements and Limitations</b>
II.B.1.a	The owner/operator shall not allow visible emissions from any stationary point or fugitive emission source on site to exceed 10% opacity. [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.1.b	The owner/operator shall use only natural gas in all fuel-burning equipment on site. [R307-401-8]
II.B.1.c	Except when in use, the owner/operator shall store all VOC- and/or HAPs-containing materials and VOC- and/or HAPs-laden rags in covered containers. [R307-401-8]
II.B.1.d	The owner/operator shall not emit more than the following from evaporative sources (painting, coating, resin mold operations, and/or cleaning) on site:  A.     16.59 tons per rolling 12-month period of VOCs.  B.     5.04 tons per rolling 12-month period of styrene.  [R307-401-8]
II.B.1.d.1	The owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. The owner/operator shall use a mass-balance method to calculate emissions from evaporative sources. The owner/operator may use the following equations with applicable units to comply with the mass balance method:  VOCs = [% VOCs by Weight/100] x [Density] x [Volume Consumed]  HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed]  [R307-401-8]

II.B.1.d.2	The owner/operator shall use a mass-balance method to quantify any amount of VOCs and HAPs reclaimed. The owner/operator shall subtract the amount of VOCs and HAPs reclaimed from the quantities calculated above to provide the monthly total emissions of VOCs and HAPs. [R307-401-8]
II.B.1.d.3	The owner/operator shall keep records each month of the following: A. The name (as per SDS) of the VOC- and HAP-emitting material. B. The maximum percent by weight of VOCs and each HAP in each material used. C. The density of each material used. D. The volume of each VOC- and HAP-emitting material used. E. The amount of VOCs and the amount of each HAP emitted from each material. F. The amount of VOCs and the amount of each HAP reclaimed and/or controlled from each material. G. The total amount of VOCs, the total amount of each HAP, and the total amount of all HAPs combined emitted from all materials (in tons). [R307-401-8]
II.B.2	<b>Paint Booth Requirements</b>
II.B.2.a	The paint booths shall be equipped with HVLP spray guns, or an equivalent method to control VOC emissions. [R307-401-8]
II.B.2.b	The owner/operator shall equip each paint spray booth with paint arrestor particulate filters, or equivalent, to control particulate emissions. All air exiting the booths shall pass through this control system before being vented to the atmosphere. [R307-401-8]
II.B.2.c	The owner/operator shall install paint arrestor particulate filters, or equivalent, that are each certified to meet a particulate matter control efficiency of no less than 95%. [R307-401-8]
II.B.2.c.1	To demonstrate compliance with the above condition, the owner/operator shall maintain records of the manufacturer's emissions guarantee for the installed paint arrestor particulate filters or equivalent. [R307-401-8]
II.B.2.d	The owner/operator shall comply with all applicable requirements of UAC Rule R307-342. Adhesives and Sealants. [R307-342]
II.B.2.e	The owner/operator shall comply with all applicable requirements of UAC Rule R307-353. Plastic Parts Coatings. [R307-353]
II.B.3	<b>Polyester Resin Mold Requirements</b>
II.B.3.a	The owner/operator shall equip each polyester resin mold with a vacuum pump discharged to a carbon adsorption filter to control emissions. [R307-401-8]
II.B.3.b	The owner/operator shall maintain and replace each carbon adsorption filter in accordance with the manufacturer's recommendations and/or instructions. [R307-401-8]
II.B.3.c	The owner/operator shall not use any resin that contains any HAPs except for styrene. [R307-401-8]

II.B.3.c.1	To demonstrate compliance with the above condition, the owner/operator shall maintain records of the Safety Data Sheet (SDS) for the resins. [R307-401-8]
II.B.3.d	The owner/operator shall not operate the resin mold stations for more than 4,400 hours combined per rolling 12-month period. [R307-401-8]
II.B.3.d.1	<p>The owner/operator shall:</p> <ul style="list-style-type: none"> <li>A. Determine hours of operation by monitoring and maintaining an operations log.</li> <li>B. Record hours of operation each day.</li> <li>C. Use the hours of operation to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months.</li> <li>D. Keep hours of operation records for all periods the plant is in operation.</li> </ul> <p>[R307-401-8]</p>
II.B.4	<b>Sanding Requirements</b>
II.B.4.a	The owner/operator shall equip each sanding booth with particulate filters, or equivalent, to control particulate emissions. All air exiting the booths shall pass through this control system before being vented to the atmosphere. [R307-401-8]

### PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Is Derived From

NOI dated August 20, 2024

## ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2e</sub>	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO <sub>x</sub>	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM <sub>10</sub>	Particulate matter less than 10 microns in size
PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO <sub>2</sub>	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds