



State of Utah

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Department of
Environmental Quality

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DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN162720001-25

August 11, 2025

Matthew Knox
ACS Manufacturing Inc.
200 East 700 South
Clearfield, UT 84015
matthew.knox@acsmanufacturing.com

Dear Mr. Knox:

Re: Intent to Approve: New Clearfield Fabrication Facility
Project Number: N162720001

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, **Lucia Mason**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Lucia Mason, can be reached at (385) 707-7669 or lbmason@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:LM:jg

cc: Davis County Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN162720001-25
New Clearfield Fabrication Facility

Prepared By
Lucia Mason, Engineer
(385) 707-7669
lbmason@utah.gov

Issued to
ACS Manufacturing Inc. - Clearfield Fabrication Facility

Issued On
August 11, 2025



New Source Review Section Manager
Alan D. Humpherys

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name

ACS Manufacturing Inc.

Source Name

ACS Manufacturing Inc. - Clearfield Fabrication Facility

Mailing Address

200 East 700 South
Clearfield, UT 84015

Physical Address

200 East 700 South
Clearfield, UT 84015

Source Contact

Name: Matthew Knox
Phone: (580) 775-2289
Email: matthew.knox@acsmanufacturing.com

UTM Coordinates

414,169 m Easting
4,550,544 m Northing
Datum NAD83
UTM Zone 12

SIC code 3444 (Sheet Metal Work)

SOURCE INFORMATION

General Description

ACS Manufacturing Inc. (ACS) has requested an AO for a new emergency system manufacturing facility in Clearfield, Davis County. The facility will produce acoustic equipment, enclosures, fuel tanks, turbine systems, and skids. Raw metal is brought to the facility where it is cut, bent, and painted.

NSR Classification

New Minor Source

Source Classification

Located in Northern Wasatch Front O3 NAA, Salt Lake City UT PM_{2.5} NAA
Davis County
Airs Source Size: B

Applicable Federal Standards

None

Project Description

ACS has requested an AO for a new emergency system manufacturing facility in Clearfield, Davis County. The facility has one (1) paint booth that will primarily emit VOCs and HAPs. The facility includes an abrasive blasting room that is controlled by a full room dust collection system and vented internally.

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)
Particulate Matter - PM ₁₀		0.06
Volatile Organic Compounds		23.60

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Ethyl Benzene (CAS #100414)		2853
Methyl Isobutyl Ketone (Hexone) (CAS #108101)		1354
Naphthalene (CAS #91203)		98
Toluene (CAS #108883)		69
Xylenes (Isomers And Mixture) (CAS #1330207)		16094
	Change (TPY)	Total (TPY)
Total HAPs		10.23

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 Ogden Standard Examiner on August 13, 2025. 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]
I.8	The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

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	Clearfield Fabrication Facility
II.A.2	One (1) Paint Booth Control: High-Volume Low-Pressure (HVLP) Spray Guns, Paint Arrestor Filters
II.A.3	One (1) Abrasive Blasting Room Control: full room dust collector <i>- Emissions are vented internally -</i>

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	Site-wide Requirements
II.B.1.a	The owner/operator shall not allow visible emissions from any source to exceed 20% opacity. [R307-201-3]
II.B.1.a.1	Opacity observations of visible emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-201-3]
II.B.1.b	The owner/operator shall install HVLP spray guns to minimize paint overspray. [R307-401-8]
II.B.1.c	The owner/operator shall install paint arrestor filters on the spray booth to control particulate emissions. [R307-401-8]
II.B.2	VOC & HAP Requirements
II.B.2.a	<p>The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site:</p> <p>23.6 tons per rolling 12-month period of VOCs</p> <p>0.05 tons per rolling 12-month period of naphthalene</p> <p>1.43 tons per rolling 12-month period of ethylbenzene</p> <p>8.05 tons per rolling 12-month period of xylenes</p> <p>0.03 tons per rolling 12-month period of toluene</p> <p>0.68 tons per rolling 12-month period of methyl isobutyl ketone</p> <p>10.23 tons per rolling 12-month period of all HAPs combined.</p> <p>[R307-401-8]</p>
II.B.2.a.1	<p>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:</p> <p>VOCs = [% VOCs by Weight/100] x [Density] x [Volume Consumed]</p> <p>HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed].</p> <p>[R307-401-8]</p>
II.B.2.a.2	<p>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.</p> <p>[R307-401-8]</p>

<p>II.B.2.a.3</p>	<p>The owner/operator shall keep records each month of the following:</p> <ul style="list-style-type: none"> 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). <p>[R307-401-8]</p>
<p>II.B.2.b</p>	<p>The owner/operator shall comply with the applicable requirements under UAC state rule R307-350 for miscellaneous metal parts products coatings. [R307-350]</p>
<p>II.B.2.c</p>	<p>The owner/operator shall comply with the applicable requirements under UAC state rule R307-206 for abrasive blasting. [R307-206]</p>

PERMIT HISTORY

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

Is Derived From
Incorporates

NOI dated May 1, 2025
Additional Information dated June 24, 2025

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 ₂	Carbon Dioxide
CO _{2e}	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 _x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM ₁₀	Particulate matter less than 10 microns in size
PM _{2.5}	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 ₂	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