

Commonwealth of Kentucky  
Division for Air Quality  
***STATEMENT OF BASIS / SUMMARY***

Conditional Major, Operating  
Permit: F-25-024

ESCO Group LLC- Covington  
3792 Lake Park Drive  
Covington, KY 41017

March 17, 2026  
Ibrahim AL-Burai, Reviewer

SOURCE ID: 21-117-00150  
AGENCY INTEREST: 2457  
ACTIVITY: APE20250002

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## SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3531, Construction Machinery and Equipment (except railway track maintenance equipment; winches, aerial work platforms; and automotive wrecker hoists).

Single Source Det.  Yes  No If Yes, Affiliated Source AI:

Source-wide Limit  Yes  No If Yes, See Section 4, Table A

28 Source Category  Yes  No If Yes, Category:

County: Kenton

Nonattainment Area  N/A  PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  Ozone  Lead  
If yes, list Classification:

PTE\* greater than 100 tpy for any criteria air pollutant  Yes  No  
If yes, for what pollutant(s)?  
 PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  VOC

PTE\* greater than 250 tpy for any criteria air pollutant  Yes  No  
If yes, for what pollutant(s)?  
 PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  VOC

PTE\* greater than 10 tpy for any single hazardous air pollutant (HAP)  Yes  No  
If yes, list which pollutant(s):

PTE\* greater than 25 tpy for combined HAP  Yes  No

\*PTE does not include self-imposed emission limitations.

### Description of Facility:

The Esco Group LLC - Covington owned and operated by ESCO Group LLC is a manufacturer of construction machinery parts. The manufacturing process consists of a shot blast cabinet and welding operations for the finishing of implements prior to surface coating operations.

**SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM**

Permit Number: F-25-024

Activities: APE20250002

Received: May 20, 2025

Application Complete Date(s): July 14, 2025

Permit Action:  Initial  Renewal  Significant Rev  Minor Rev  Administrative

Construction/Modification Requested?  Yes  No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action  Yes  No

APE20250001: Changes to coatings used in the two facility paint spray booths (EP 04). The Baril 710 coating is being replaced with Jones Blair Stantest 2.8 and there is the addition of a new primer (HP 963-73).

**Description of Action:**

Renewal permit with addition of two new coatings products, HP 196-4360/59 and Carboline 8215VOC which replaced Jones Blair Stantest 2.8.

F-25-024 Emission Summary		
Pollutant	2024 Actual (tpy)	PTE F-25-024 (tpy)
CO	0	0.000
NO <sub>x</sub>	0	0.000
PT	0.123	4.121
PM <sub>10</sub>	0.123	4.121
PM <sub>2.5</sub>	0.121	3.362
SO <sub>2</sub>	0	0.000
VOC	2.726	125.997*
Lead	0	0.000
Greenhouse Gases (GHGs)		
Carbon Dioxide	0.00	0.00
Methane	0.00	0.00
Nitrous Oxide	0.00	0.00
CO <sub>2</sub> Equivalent (CO <sub>2</sub> e)	0.00	0.00
Hazardous Air Pollutants (HAPs)		
Chromium, Total (as Cr)	0.0001	0.02
Manganese	0.007	0.311
Total HAPs:	0.0071	0.801

\*Note: The permittee has requested federally enforceable emission limitations to preclude major source status under 401 KAR 52:020.

**SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS**

<b>Emission Unit 02 Arc Welding Stations</b>				
<b>Pollutant</b>	<b>Emission Limit or Standard</b>	<b>Regulatory Basis for Emission Limit or Standard</b>	<b>Emission Factor Used and Basis</b>	<b>Compliance Method</b>
PM	2.34 lb/hr	401 KAR 59:010, Section 3(2)	AP-42	70% PM control for building enclosure; Cartridge filters for robotic welders, 80% & 95% control efficiency.
	20% opacity	401 KAR 59:010, Section 3(1)a	N/A	Recordkeeping of weekly visual observations
Chromium, Cobalt, Manganese, Nickel	20% opacity	40 CFR 63.11516(f)(6).	N/A	Graduated schedule of visual observations from Subpart XXXXXX

**Initial Construction and Modification Date:** See below

**Process Description:**

The emission point consists of 48 gas metal arc welding stations, 15 arc cutters and 2 robotic welding stations. The shield gas is 92% Argon: 8% Carbon dioxide. The emissions from the welding process are primarily from the consumption of the welding wire. The hourly consumption rate of welding wire is approximately 300 pounds from the 48 welding manual stations, 6.25 pounds per station, and approximately 50 pounds from the robotic station. The welding fumes are exhausted through facility roof vents and cross ventilation fans. No control equipment is utilized to control particulate emission from the manual welding stations. The robotic welding station has a cartridge filtering system that reduces particulate emissions by an estimated 80%. The construction of the manual welding stations was commenced between September, 1989 through October, 2015. The robotic welding station’s construction commenced September, 2014 and May 2019.

**Applicable Regulation:**

401 KAR 59:010, New process operations.

401 KAR 63:002, Section 2(4)(vvvvv), 40 C.F.R. 63.11514 through 63.11523, Tables 1 through 2 (Subpart XXXXXX), *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.*

**Comments:**

- The source is area source for HAP and use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel. [40 CFR 63.11514 (b)]
- 401 KAR 63:020 is not applicable because emissions and emission unit subject to 40 C.F.R. 63 Subpart XXXXXX.
- There are no VOC emissions from the welding stations.

<b>Emission Unit 03 Shot Blast Cabinet</b>				
<b>Pollutant</b>	<b>Emission Limit or Standard</b>	<b>Regulatory Basis for Emission Limit or Standard</b>	<b>Emission Factor Used and Basis</b>	<b>Compliance Method</b>
PM	2.34 lb/hr	401 KAR 59:010, Section 3(2)	Engineering Estimate	Cartridge dust collector (99% PM control efficiency)
	20% opacity	401 KAR 59:010, Section 3(1)a	N/A	Recordkeeping of weekly visual observations

**Initial Construction Date:** 12/1999

**Process Description:**

The emission point consists of a Pangborn Shot Blast cabinet to finish steel implements prior to spraying coatings. The cabinet is an enclosed loop system. The heavy particulate falls through a grate in the floor of the cabinet and is conveyed by an auger to a collection bin for reuse. Fine particulate is aspirated through a high efficiency cartridge dust collector prior to exhaust to the atmosphere. The claimed efficiency of the cartridge dust collector is 99%.

**Applicable Regulation:**

**401 KAR 59:010**, *New process operations*

**401 KAR 63:002**, Section 2(4)(vvvvv), 40 C.F.R. 63.11514 to 63.11523, Tables 1 to 2 (Subpart XXXXXX), *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*.

**Comments:**

- The emissions from abrasive blasting are calculated using an engineering estimation of 1.38 lbs PM emissions per ton blast material used.
- 401 KAR 63:020 is not applicable because emissions and emission unit subject to 40 C.F.R. 63 Subpart XXXXXX.
- There are no VOC emissions from the Shot Blasting operation.

<b>Emission Unit 04 Paint Spray Booths</b>				
<b>Pollutant</b>	<b>Emission Limit or Standard</b>	<b>Regulatory Basis for Emission Limit or Standard</b>	<b>Emission Factor Used and Basis</b>	<b>Compliance Method</b>
VOC	Source-wide 20 tpy of VOC emissions	To preclude 401 KAR 59:225 & 401 KAR 52:020	Material Balance & MSDS	Recordkeeping, 12 month rolling total
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & MSDS with 75% Transfer Efficiency	Exhaust filters, 99% C.E., Manufacturer's guarantee
	20% Opacity	401 KAR 59:010, Section 3(1)	N/A	Weekly visual observation

**Initial Construction Date:** See below

**Process Description:**

**K001-DeVeilbiss**, a manual paint spray booth is utilized for surface coating operation to produce construction equipment implement such as back hoe buckets. Surface coating operation includes spraying of top coat, base coat/primer and clear coat on the steel construction equipment.

Maximum coating application rate: 3 gallons per hour

Control equipment: exhaust filters

Date commenced: September 1989- May 2019

**K002-JBI**, a manual paint spray booth is utilized for surface coating operation to produce construction equipment implement such as back hoe buckets. Surface coating operation includes spraying of top coat, base coat/primer and clear coat on the steel construction equipment.

Maximum coating application rate: 3 gallons per hour

Control equipment: exhaust filters

Date commenced: December 1999- October 2016

**Applicable Regulations:**

**401 KAR 59:010**, *New process operations*

**401 KAR 63:020**, Potentially hazardous matter or toxic substances.

**PRECLUDED REGULATIONS:**

The source accepted source wide emissions limit for VOCs to preclude the applicability of 401 KAR 59:225, New miscellaneous Metal Parts and products surface coating operations.

**Comments:**

- The source has requested 20 tpy source-wide VOC emission limitation to preclude 401 KAR 52:020. This limit also precluded the applicability of 401 KAR 59:225 for affected facilities (EU04 and EU05).
- Added products (2025): HP-963-73(Primer)least used and Carboline 8215VOC is replacing Jones Blair Stantest.
- Solvent- IPS 101 had been removed.

<b>Emission Unit 05 Area Spraying Operation</b>				
<b>Pollutant</b>	<b>Emission Limit or Standard</b>	<b>Regulatory Basis for Emission Limit or Standard</b>	<b>Emission Factor Used and Basis</b>	<b>Compliance Method</b>
VOC	Source-wide 20 tpy of VOC emissions	To preclude 401 KAR 59:225 & 401 KAR 52:020	Material Balance & SDS	Recordkeeping, 12 month rolling total
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & MSDS with 65% Transfer Efficiency	70% PM control for building enclosure
	20% Opacity	401 KAR 59:010, Section 3(1)	N/A	Weekly visual observation

**Initial Construction Date:** 06/2013

**Process Description:**

This emission point refers to spraying operations for the painting of construction implements which are too large for the spray booths. The implements are painted electrostatically or with an HVLP applicator.

**Applicable Regulations:**

**401 KAR 59:010**, *New process operations*

**401 KAR 63:020**, Potentially hazardous matter or toxic substances.

**PRECLUDED REGULATIONS:**

The source accepted source wide emissions limit for VOCs to preclude the applicability of 401 KAR 59:225, New miscellaneous Metal Parts and products surface coating operations.

**SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)**

**Testing Requirements/Results**

N/A

**Footnotes:**

**SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS**

**Table A - Group Requirements:**

<b>Emission and Operating Limit</b>	<b>Regulation</b>	<b>Emission Unit</b>
20 tpy of VOC emissions	To preclude 401 KAR 52:020	Source-wide

**Table B - Summary of Applicable Regulations:**

<b>Applicable Regulations</b>	<b>Emission Unit</b>
401 KAR 59:010, New process operations	EU 02, 03, 04 & 05
401 KAR 63:002, Section 2(4)(vvvvv), 40 C.F.R. 63.11514 through 63.11523, Tables 1 to 2 (Subpart XXXXXX), <i>National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.</i>	EU 02 & 03
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances.</i>	EU 04

**Table C - Summary of Precluded Regulations:**

<b>Precluded Regulations</b>	<b>Emission Unit</b>
401 KAR 59:225, New miscellaneous Metal Parts and products surface coating operations.	EU04 and 05

**Table D - Summary of Non Applicable Regulations:**

<b>Non Applicable Regulations</b>	<b>Emission Unit</b>
N/A	

**Air Toxic Analysis**

**401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances***

The Division for Air Quality (Division) has performed SCREEN View on September 22, 2025 of potentially hazardous matter or toxic substances (Ethyl Benzene , Xylene and Naphthalene) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Additional refined model AERMOD was performed on February 19, 2026 on Naphthalene pollutant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

**Single Source Determination**

N/A

**SECTION 5 – PERMITTING HISTORY**

<b>Permit</b>	<b>Permit Type</b>	<b>Activity #</b>	<b>Complete Date</b>	<b>Issuance Date</b>	<b>Summary of Action</b>	<b>PSD/Syn Minor</b>
F-10-005	Renewal	APE20090001	1/27/2010	7/2/2010	Renewal	N/A
F-10-005 R1	Revision	APE20130001	6/25/2013	8/1/2013	Revision	N/A
F-15-001	Renewal	APE20140002	6/3/2015	8/28/2015	Renewal	N/A
F-15-001 R1	Admin Amend	APE20180002	9/27/2018	10/29/18	name/owner-ship change	N/A
F-20-010	Renewal	APE20200001	6/4/2020	11/22/2020	Renewal Permit	N/A

**SECTION 6 – PERMIT APPLICATION HISTORY**

N/A

## **APPENDIX A – ABBREVIATIONS AND ACRONYMS**

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO <sub>x</sub>	– Nitrogen Oxides
NSR	– New Source Review
PM	– Particulate Matter
PM <sub>10</sub>	– Particulate Matter equal to or smaller than 10 micrometers
PM <sub>2.5</sub>	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO <sub>2</sub>	– Sulfur Dioxide
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds