UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
345 COURTLAND STREET. N.E.
ATLANTA, GEORGIA 30365

Jul 20 1995

4APT-AEB

Mr. Ron Methier, Chief
Air Protection Branch
Environmental Protection Division
Georgia Dept. Of Natural Resources
4244 International Pkwy., ste, 120
Atlanta, GA 30354

SUBJ: Site Specific Determination of Common Control United Technologies Corporation; Columbus, G.A.

Dear Mr. Methier:

We have reviewed the letter dated May 19, 1995, which was submitted to the Environmental Protection Agency (EPA) Region 4 by Mr, Edward Cutrer of your office regarding Title V applicability of the United Technologies Corporation, Columbus, Georgia, facility. As discussed in the letter and correspondence submitted to us, United Technologies indirectly owns 50 percent of Precision Components International, inc., Which manufactures blades. The other 50 percent of Precision Components is indirectly owned by the Wertheimer Group. Based on the information provided to EPA and available guidance related, to the issue of common control the United Technologies and Precision Components International facilities should he considered to be one source under common control for Title V applicability purposes.

Based on a March 16, memorandum from EPA headquarters concerning the definition of "source" and the common control issue, a person who has 50 percent voting interest in an entity will be considered to have control, Therefore, the fact that United Technologies can indirectly exercise 50 percent voting power in Precision Components through another company which it has 100 percent control over, indicates that United Technologies and Precision Components should be considered under common control. Although the operational management of Precision Components is directed by the Wertheimer Group, the power of United Technologies to make or veto decisions regarding the implementation of major emission control measures and to influence production levels at the two facilities is considered most important in the issue of common control. In addition, based on discussions with personnel from your office, the operations of the United Technologies and Precision Components facilities are not totally independent of each other. Since the blades which are manufactured by Precision Components are mounted on disks manufactured by United Technologies for use in jet engines, it appears that the production levels at one facility

would Influence the production levels at the other, These issues and the fact that the two manufacturing operations are located within the sane building and have the same SIC codes further suggest that the two facilities should be considered as one source for Title V applicability purposes. Also, the fact that United Technologies and Precision Components may be treated as separate entities under Georgia corporate law does not justify the separation of the two facilities for applicability of Clean Air Act environmental regulations.

If there are any questions regarding the contents of this letter, please contact Keith Goff of my staff at (404) 347-2904.

Sincerely yours,

Jewell A. Harper
Chief
Air Enforcement Branch

Air, Pesticides, and Toxics
Management Division