

Statement of Basis
Wellborn Forest Products
(Woodworking & Surface Coating Processes)

Major Source of Volatile Organic Compound Emissions and
Hazardous Air Pollutant Emissions

Introduction

On February 06, 2015, Wellborn Forest Products submitted a Title V major source permit renewal application for the manufacture and surface coating of wooden kitchen and bath cabinets (SIC # 2434). Wellborn Forest Products is located in Alexander City, Alabama. This renewal will not add any permitted units. This renewal will remove the following permitted unit.

The Automatic Spraying System (006)

Wellborn Forest Products is a manufacturer of wooden kitchen and bath cabinets. Facility operations can be divided into the woodworking, surface coating, and assembly.

The woodworking operations include raw material receiving and wood shaping areas. The incoming wood is chopped into lengths, and then conveyed to the various woodworking operations that include shaping, boring, drilling, and sanding. These processes are sources of particulate emissions. All particulate generated from woodworking is controlled by a dust collection system served by a single baghouse. Collected wood dust is blown into one of two trailers and shipped off-site.

After the wood is shaped into its appropriate dimension, it is conveyed to the surface coating line. The surface coating of the wood workpieces is as follows.

The Conventional System (007) has 3 units operating within the same room which consist of the (a) Overhead Line, (b) Flat Line, and (c) Experimental Line. The (a) Overhead Line consists of two stain booths, three sealer booths, one glaze booth, two topcoat booths, and six IR drying ovens. The (b) Flat Line consists of one stain booth, two sealer booths, one glaze booth, one topcoat booth, and five IR drying ovens. The (c) Experimental Line consists of one stain booths with three passes and two IR drying ovens.

Once dry, the coated pieces are conveyed to the assembly area. The coated pieces are assembled with particleboard and plywood to form the final

products. The final products are then packaged and either stored in the warehouse or shipped off-site.

Volatile organic compounds (VOCs) from the organic solvents in the paint, paint thinners, adhesives, and cleanup solvents, are regulated criteria air contaminants emitted to the atmosphere by the surface coating and adhesion of the wooden cabinets. The surface coating and adhesion operations are also a source of hazardous air pollutants (HAPs), as listed in Appendix G of the ADEM Air Regulations.

Potential emission of VOCs exceeds the threshold of 100 tons per year. Therefore, Wellborn Forest Products is considered a major source for Title V. The potential emissions of VOCs are below the PSD threshold of 250 tons per year because Wellborn Forest Products has a VOC emission limit of 235 tons facility-wide per consecutive rolling 12-month period. No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

The potential HAP emissions from the coating operation are also emitted in such quantities as to exceed the Title III and Title V major source thresholds. The HAP emission thresholds for a major source are 10 tons for a single HAP and 25 tons for a combination of any HAPs.

The surface coating lines and adhesion operation is subject to the NESHAP for the Manufacture of Wood Furniture, Subpart (JJ). This regulation requires Wellborn Forest Products to limit emissions of certain HAPs in their coatings and adhesives, and to implement certain work practices and training for operators.

The following is a list of all of the facility's sources (individual emissions units) which will be part of the facility's Title V Major Source Operating Permit:

Permit Unit No.	Description of Unit
001	Woodworking Operations with Baghouse
004	Adhesion Operations
005	Glaze Spray Booth Line
007	Conventional System Coating Line

Monitoring of Emissions

Wellborn Forest Products will maintain records of monthly coating usage and coating analysis to show compliance with both their Synthetic Minor PSD limits and their Wood Furniture MACT requirements. These will be submitted quarterly.

The woodworking operations are subject to opacity and particulate standards. The baghouse will be monitored weekly by observing opacity to indicate compliance with the particulate standards. If emissions that are greater than normal are noted, corrective action to minimize emissions will be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal. Records of weekly observations and any corrective actions will be retained for at least five years.

This is the monitoring in the existing Title V Permit. This monitoring has been shown to be sufficient in the past; therefore, no change to the monitoring is needed. CAM is not applicable because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with control device(s).

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of the proposal of this major source operating permit will be sent to all affected states bordering Alabama.

Recommendations

I recommend that the attached permit be issued to Wellborn Forest Products.

Kevin M. Fulmer
Chemical Branch
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