

STATEMENT OF BASIS
“JIM BISHOP” CABINETS, INC.

Facility No. 209-0038

Montgomery, Alabama

Jim Bishop is currently operating with a Major Source Operating Permit (MSOP), and an Air Permit (AP) X003 issued on December 4, 2016, and February 7, 2017, respectively. On February 13, 2019, this facility submitted additional information to their modified November 16, 2018’s MSOP application to incorporate AP-X003. Jim Bishop is currently subject to *40 CFR Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations*.

OPERATIONS:

Jim Bishop is a manufacturer of wooden cabinets and their operations consist of woodworking, surface coating and assembly. This facility generally operates 16 hours, 5 days a week for approximately 4,080 hours per year, and their SIC and NAICS Codes are #2434 and #337110, respectively. The incoming wood products such as plywood, particle board, hard board and fiberboard are conveyed to the woodworking operations that consist of cutting, drilling and sanding. The finished wood components are then conveyed to the surface coating line.

CURRENT PERMITS:

Jim Bishop’s current permits consist of a MSOP (001& 002), and an Air Permit X003.

MSOP – 001: Wood cabinet coating line and assembly - four (4) manually operated spray booths.

MSOP – 002: Woodworking operations with two (2) baghouses.

AP - X003: One (1) off-line surface coating booth.

PROPOSED MSOP:

The following is a list of the facility’s sources that will become the modified Title V - MSOP:

Permit Unit No.	Description of Unit
001	Wood Cabinet Coating Line
002	Woodworking Operations with Baghouse
003	One (1) Off-line Surface Coating Booth

EMISSIONS / REQUIRMENT:

The baghouses are designed to have removal efficiencies of > 99.8, 97.0 and 95.0% for the Particulate Matter (PM), PM₁₀ and PM_{2.5} emissions, respectively. The wood waste is collected in dumpsters and disposed of off-site at a local landfill. Jim Bishop is considered a Class 1 County

Source and its allowable PM emissions are 20.24 tpy, using $E = 3.59P^{0.62}$. PM emissions are regulated under ADEM Rules 335-3-4.04(1), 335-3-4.01(1) and 335-3-4.02. Their PM emissions from the woodworking operations are conveyed to one of the two (2) reverse-air baghouses.

Volatile organic compounds (VOCs) from the solvents in the paints, stains, glazes, paint thinners, adhesives, cleanup solvents and etc., are regulated criteria air contaminants emitted to the atmosphere by the surface coating of the wood cabinet components. These operations are also a source of hazardous air pollutants (HAPs), as listed in Appendix G of the ADEM Air Regulations.

Jim Bishop's potential VOC emissions exceeds the major source threshold of 100 tons per year. Therefore, Jim Bishop is considered a major source for Title V. Their potential VOC emissions does not exceed the PSD threshold of 250 tons per year. This facility currently holds a facility-wide VOC emissions limit of 235 tons per consecutive rolling 12-month period in order to avoid PSD requirements. No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

Jim Bishop's potential HAP emissions from the cabinet coating line are also emitted in such quantities as to exceed the Title III and Title V major source thresholds. The HAP emissions thresholds for a major source are 10 tons for a single HAP, and 25 tons for any combination of HAPs.

The cabinet coating line and the adhesives used in assembly are subject to *NESHAP's 40 CFR 63 Subpart JJ*, for Wood Furniture Manufacturing Operations. This regulation requires Jim Bishop to limit emissions of certain HAPs in their coatings and adhesives, and to implement certain work practices and training for operators.

Monitoring of Emissions

Jim Bishop is subject to *NESHAP's 40 CFR 63 Subpart JJ - MACT* standards as an existing source. This facility shall not emit greater than 1.0 pound of VHAP per gallon of solids as delivered to the applicator for all coatings and adhesives, among other requirements. This facility is currently complying with the MACT Standard for the Wooden Furniture Industry. Jim Bishop will maintain records of monthly coating and adhesive usage and analysis to show compliance with the Wood Furniture MACT requirements and these reports will be submitted to the Department quarterly.

The woodworking operations at the facility are subject to opacity and PM standards. The dust collection system will be monitored daily by observing opacity to indicate compliance with the PM standards. If emissions 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 daily observations and any corrective actions will be retained for at least five years.

Jim Bishop has a 2.8 MMBtu/hr natural gas-fired drying oven at the end of its cabinet coating line and another small natural gas-fired oven used to clean paint from the hooks used on the conveyor line. No periodic monitoring for any emissions will be required on these ovens due to the inherently clean nature of the fuel and the small sizes of the ovens.

Permitting Fees

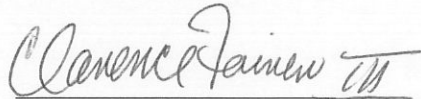
Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

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

RECOMMENDATIONS:

Based on the above analysis, I recommend modifying Jim Bishop's current MSOP to incorporate AP-X003 pending an e-Notice period and EPA review. Jim Bishop's MSOP will consist of three (3) units. Jim Bishop will be required to keep and submit quarterly emissions reports to this Department and continue to comply with *NESHAP's 40 CFR 63 Subpart JJ - MACT* standard requirements.



Clarence Fairer III
Chemical Branch

February 22, 2019
Date