

Statement of Basis  
Legacy Cabinets, Inc.  
(Wood Working & Surface Coating Processes)

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

Introduction

On August 1, 2019, Legacy Cabinets, Inc. submitted a renewal Title V major source permit application for the manufacture and surface coating of wooden kitchen cabinets (SIC # 2434). Legacy Cabinets, Inc. is located in Eastaboga, Alabama. Facility operations consist of woodworking, surface coating, and assembly. This renewal will also incorporate Air Permit X006 (Surface Coating Line No. 6) and Air Permit X007 (Surface Coating Line No. 7) and remove Line No. 2.

Modification Description

LINE NO.	EXISTING TITLE V VOC LIMIT (TPY)	EXISTING AIR PERMIT VOC LIMIT (TPY)*
1	249 W/ NO. 2,3	
2	249 W/ NO. 1,3	REMOVED
3	249 W/ NO. 1,2	
4	237	
5	39.0	
6		110.0
7		39.0

\*Which is being incorporated into the Title V renewal.

Process Description

Following the woodworking operations, the wood is then conveyed to the surface coating lines that consist of several spray booths and natural gas-fired ovens. The typical coating line consists of a stain booth, drying tunnel, sealer booth, drying oven, topcoat booth, and drying oven.

Volatile organic compounds (VOCs) from the organic solvents in the paint, paint thinners, and cleanup solvents, are regulated criteria air contaminants emitted to the atmosphere by the surface coating of the wooden kitchen

cabinets. The surface coating operations are also a source of hazardous air pollutants (HAPs), as listed in Appendix G of the ADEM Air Regulations.

### Regulations

Potential emissions of VOCs exceeds the threshold of 100 tons per year. Therefore, Legacy Cabinets is considered a major source for Title V. Legacy Cabinets has requested VOC emission limits of a 249 TPY limit on Line Nos. 1, 2, and 3, a limit of a 237 TPY limit on Line No. 4, and a limit of 39 TPY on Line No. 5 for any consecutive rolling 12-month period in order to avoid PSD requirements. Therefore, Legacy Cabinets is considered a major source for PSD for future additions. Legacy is incorporating Line No. 6 which has undergone a PSD BACT review into this permitting action and currently has a limit of 110 TPY. This PSD BACT review/permitting action also incorporated several other permitting restrictions into Line No. 6 and the other lines which also need to be added to this permitting action such as changing the facility-wide MACT limit to 0.7 pounds of VHAP/pound of Solids. Legacy is incorporating Line No. 7 which has a PSD Synthetic minor permit limit into this permitting action.

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 coating lines are all subject to the NESHAP for the Manufacture of Wood Furniture, Subpart (JJ). This regulation requires Legacy Cabinets to limit emissions of certain HAPs in their coatings and to implement certain work practices and training for operators.

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

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	Surface Coating Line No. 1
003	Miscellaneous Coating Booth(s) Line No. 3
004	Surface Coating Line No. 4
005	Surface Coating Line No. 5
006	Surface Coating Line No. 6
007	Surface Coating Line No. 7
010	Woodworking Operations with Cyclone(s)/Baghouse(s)
020	3 MMBTU/HR Natural Gas Fired Boiler

### **Monitoring of Emissions**

Legacy Cabinets will maintain records of monthly coating usage and coating analysis for each line to show compliance with both their PSD limits and their Wood Furniture MACT requirements. These will be submitted quarterly.

The woodworking operations are subject to opacity and particulate standards. The particulate control devices on the woodworking operations are connected in series. Weekly visible observations of the baghouse should be sufficient monitoring considering the efficiency of the baghouse and past lack of opacity problems. Records of these observations shall be made.

Legacy Cabinets has an approximately 2 MMBtu/hr, natural gas-fired drying oven on Coating Line No. 4. No periodic monitoring for any pollutant will be required on this oven due to the inherently clean nature of the fuel and the small size of the oven.

Legacy Cabinets has a 2.8 and a 2.0 MMBtu/hr, natural gas-fired boiler. No periodic monitoring for any emissions will be required on these boilers due to the inherently clean nature of the fuel and the small size of the boilers.

This monitoring in the existing Title V Permit has been shown to be sufficient in the past and; therefore, no further changes 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).

### **Recommendations**

I recommend that the attached permit be issued to Legacy Cabinets, Inc. pending the public comment period.

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Kevin Fulmer  
Chemical Branch  
November 2019



# MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** LEGACY CABINETS, INC  
**FACILITY/PERMIT  
NO.:** 309-0030  
**LOCATION:** EASTABOGA, ALABAMA

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

**Issuance Date:** February 15, 2020  
**Effective Date:** February 15, 2020  
**Expiration Date:** February 14, 2025

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## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Transfer</u></b> This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.</p>	<p>Rule 335-3-16-.02(6)</p>
<p><b>2. <u>Renewals</u></b> An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit. The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	<p>Rule 335-3-16-.12(2)</p>
<p><b>3. <u>Severability Clause</u></b> The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	<p>Rule 335-3-16-.05(e)</p>
<p><b>4. <u>Compliance</u></b></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	<p>Rule 335-3-16-.05(f)</p> <p>Rule 335-3-16-.05(g)</p>
<p><b>5. <u>Termination for Cause</u></b> This permit may be modified, revoked, reopened, and</p>	<p>Rule 335-3-16-.05(h)</p>

## General Permit Provisos

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<p>reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	
<p>6. <b><u>Property Rights</u></b> The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	Rule 335-3-16-.05(i)
<p>7. <b><u>Submission of Information</u></b> The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.</p>	Rule 335-3-16-.05(j)
<p>8. <b><u>Economic Incentives, Marketable Permits, and Emissions Trading</u></b> No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	Rule 335-3-16-.05(k)
<p>9. <b><u>Certification of Truth, Accuracy, and Completeness:</u></b> Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	Rule 335-3-16-.07(a)
<p>10. <b><u>Inspection and Entry</u></b> Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <p>(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;</p>	Rule 335-3-16-.07(b)



## General Permit Provisos

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<ul style="list-style-type: none"> <li>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</li> <li>(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;</li> <li>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</li> </ul>	
<p><b>11. <u>Compliance Provisions</u></b></p> <ul style="list-style-type: none"> <li>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</li> <li>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</li> </ul>	<p>Rule 335-3-16-.07(c)</p>
<p><b>12. <u>Compliance Certification</u></b></p> <p>A compliance certification shall be submitted annually within 60 days of the anniversary date of issuance of this permit.</p> <ul style="list-style-type: none"> <li>(a) The compliance certification shall include the following: <ul style="list-style-type: none"> <li>(1) The identification of each term or condition of this permit that is the basis of the certification;</li> <li>(2) The compliance status;</li> <li>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);</li> <li>(4) Whether compliance has been continuous or intermittent;</li> <li>(5) Such other facts as the Department may require to determine the compliance status of the source;</li> </ul> </li> <li>(b) The compliance certification shall be submitted to:</li> </ul> <p style="text-align: center;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p>	<p>Rule 335-3-16-.07(e)</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p style="text-align: center;">and to:</p> <p style="text-align: center;">Air Enforcement and TOXICS Branch EPA Region 4 61 Forsyth Street, SW Atlanta, GA 30303</p>	
<p><b>13. <u>Reopening for Cause</u></b></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <ul style="list-style-type: none"> <li>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</li> <li>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</li> <li>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</li> <li>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</li> </ul>	<p>Rule 335-3-16-.13(5)</p>
<p><b>14. <u>Additional Rules and Regulations</u></b></p> <p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p>
<p><b>15. <u>Equipment Maintenance or Breakdown</u></b></p> <ul style="list-style-type: none"> <li>(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director</li> </ul>	<p>Rule 335-3-1-.07(1), (2)</p>

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<p>at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:</p> <ol style="list-style-type: none"> <li>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</li> <li>(2) The expected length of time that the air pollution control equipment will be out of service;</li> <li>(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;</li> <li>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</li> <li>(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.</li> </ol> <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.</p>	
<p><b>16. <u>Operation of Capture and Control Devices</u></b></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	<p>§22-28-16(d), Code of Alabama 1975, as amended</p>
<p><b>17. <u>Obnoxious Odors</u></b></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate</p>	<p>Rule 335-3-1-.08</p>

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<p>the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p> <p><b>18. Fugitive Dust</b></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:</p> <p>(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;</p> <p>Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.</p>	<p>Rule 335-3-4-.02</p>
<p><b>19. Additions and Revisions</b></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>Rule 335-3-16-.13 and .14</p>
<p><b>20. Recordkeeping Requirements</b></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <p>(1) The date, place, and time of all sampling or measurements;</p> <p>(2) The date analyses were performed;</p> <p>(3) The company or entity that performed the</p>	<p>Rule 335-3-16-.05(c)2.</p>

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<p>analyses;</p> <p>(4) The analytical techniques or methods used;</p> <p>(5) The results of all analyses; and</p> <p>(6) The operating conditions that existed at the time of sampling or measurement.</p> <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit</p>	
<p><b>21. <u>Reporting Requirements</u></b></p> <p>(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p>	<p>Rule 335-3-16-.05(c)3.</p>
<p><b>22. <u>Emission Testing Requirements</u></b></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(1) The date the test crew is expected to arrive, the</p>	<p>Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)</p> <p>Rule 335-3-1-.04</p>

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<p>date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).</p> <p>(3) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p> <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	
<p><b>23. <u>Payment of Emission Fees</u></b></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.</p>	<p>Rule 335-3-1-.04</p> <p>Rule 335-1-7-.04</p>
<p><b>24. <u>Other Reporting and Testing Requirements</u></b></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>Rule 335-3-1-.04(1)</p>
<p><b>25. <u>Title VI Requirements (Refrigerants)</u></b></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified</p>	<p>335-3-16-.05(a)</p>

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<p>recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	
<p><b>26. <u>Chemical Accidental Prevention Provisions</u></b></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <ul style="list-style-type: none"> <li>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</li> <li>(b) The owner or operator shall submit one of the following: <ul style="list-style-type: none"> <li>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</li> <li>(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</li> </ul> </li> </ul>	<p>40 CFR Part 68</p>
<p><b>27. <u>Display of Permit</u></b></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.</p>	<p>Rule 335-3-14-.01(1)(d)</p>
<p><b>28. <u>Circumvention</u></b></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>Rule 335-3-1-.10</p>
<p><b>29. <u>Visible Emissions</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity</p>	<p>Rule 335-3-4-.01(1)</p>

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<p>of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	
<p><b>30. <u>Fuel-Burning Equipment</u></b></p> <p>(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p> <p>(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p>	<p>Rule 335-3-4-.03</p> <p>Rule 335-3-5-.01</p>
<p><b>31. <u>Process Industries - General</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.</p>	<p>Rule 335-3-4-.04</p>
<p><b>32. <u>Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>Rule 335-3-1-.05</p>



## Operating Permit Summary No. 1.

**Emission Unit(s):**

Surface Coating Line No. 1

**Description:**

Wooden kitchen cabinet surface coating line

**Type and quantity of fuel used:**

Primary: Natural gas

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	249 TONS OF VOCs PER ROLLING 12 MONTH PERIOD FOR UNIT NO. 1, UNIT NO. 3	SYNTHETIC MINOR PSD
HAPs	0.7 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL COATINGS	MACT Subpart JJ REVIEW

## Unit Specific Provisos

### Federally Enforceable Provisos

### Regulations

#### *Section 1--Applicability*

1. This source is subject to a PSD synthetic minor emission limitation.
2. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Wood Furniture Manufacturing Operations as an "Existing Source" to include 40 CFR Part §63.800(a) among other requirements.

ADEM Admin. Code  
R. 335-3-14-.04

ADEM Admin. Code  
R. 335-3-11-.06(35)

#### *Section 2--Emission Standards*

1. Emission of Volatile Organic Compounds (VOCs) from Unit No. 1 and Unit No. 3, from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 249 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.
2. This facility shall not emit a weighted average of greater than 0.7 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average to include 40 CFR Part §63.802(a) among other requirements.

ADEM Admin. Code  
R. 335-3-14-.04(8)

ADEM Admin. Code  
R. 335-3-11-.06(35)  
ADEM Admin. Code  
R. 335-3-14-.01

#### *Section 3--Compliance and Performance Test Methods and Procedures*

1. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code  
R. 335-3-11-.06(35)

2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code  
R. 335-3-1-.04

#### *Section 4--Emission Monitoring*

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

#### *Section 5--Recordkeeping and Reporting Requirements*

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:
  - (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
  - (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
  - (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
  - (d) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

ADEM Admin. Code  
R. 335-3-1-.04

- (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
  - (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons
  - (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
2. This facility shall maintain records as required in 40 CFR Part §63.800 through §63.808. This record-keeping concerns Subpart JJ--NESHAPs for Wood Furniture Manufacturing Operations. This facility shall maintain and submit records to include 40 CFR Part §63.804(a)(1), §63.804(b), §63.804(c)(1), §63.804(f)(1-4,5,7,8), §63.804(g), §63.804(h), §63.804(i), §63.806(a), §63.806(b), §63.806(c), §63.806(d), §63.806(e), §63.806(h), §63.806(i), §63.806(j), §63.807(a), §63.807(b), §63.807(c), §63.807(d), §63.807(e), among other requirements.
3. A report summarizing the information in proviso 5.1 and 5.2 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

ADEM Admin. Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-1-.04

## Operating Permit Summary No. 3

**Emission Unit(s):**  
**Description:**

Miscellaneous Coating Booth(s)  
Miscellaneous Coating Booth(s) and  
Miscellaneous Spray Booth(s) used for  
adhesives.

**Type and quantity of fuel used:**

Primary: None

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	249 TONS OF VOCS PER ROLLING 12 MONTH PERIOD FOR UNIT NO. 1, UNIT NO. 3	SYNTHETIC MINOR PSD
HAPs	0.7 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL COATINGS	MACT Subpart JJ REVIEW

## Unit Specific Provisos

### Federally Enforceable Provisos

### Regulations

#### *Section 1--Applicability*

1. This source is subject to a PSD synthetic minor emission limitation.
2. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Wood Furniture Manufacturing Operations as an "Existing Source".

ADEM Admin. Code  
R. 335-3-14-.04

ADEM Admin. Code  
R. 335-3-11-.06(35)

#### *Section 2--Emission Standards*

1. Emission of Volatile Organic Compounds (VOCs) from Unit No. 1 and Unit No. 3, from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 249 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.
2. This facility shall not emit a weighted average of greater than 0.7 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average among other requirements.

ADEM Admin. Code  
R. 335-3-14-.04(8)

ADEM Admin. Code  
R. 335-3-11-.06(35)  
ADEM Admin. Code  
R. 335-3-14-.01

#### *Section 3--Compliance and Performance Test Methods and Procedures*

1. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.
2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-1-.04

**Federally Enforceable Provisos****Regulations***Section 4--Emission Monitoring*

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

*Section 5--Recordkeeping and Reporting Requirements*

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:
  - (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
  - (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
  - (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

ADEM Admin. Code  
R. 335-3-1-.04

- (d) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
  - (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
  - (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons
  - (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
2. This facility shall maintain records as required in 40 CFR Part §63.800 through §63.808. This record-keeping concerns Subpart JJ--NESHAPs for Wood Furniture Manufacturing Operations. ADEM Admin. Code R. 335-3-11-.06(35)
3. A report summarizing the information in proviso 5.1 and 5.2 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance. ADEM Admin. Code R. 335-3-1-.04



## Operating Permit Summary No. 4

**Emission Unit(s):**

Surface Coating Line No. 4

**Description:**

Wooden kitchen cabinet surface coating line

**Type and quantity of fuel used:**

Primary: None

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	237 TONS OF VOCs PER ROLLING 12 MONTH PERIOD FOR UNIT NO. 4	SYNTHETIC MINOR PSD
HAPs	0.7 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL COATINGS	MACT Subpart JJ REVIEW

## Unit Specific Provisos

### Federally Enforceable Provisos

### Regulations

#### *Section 1--Applicability*

1. This source is subject to a PSD synthetic minor emission limitation.
2. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Wood Furniture Manufacturing Operations as an "Existing Source".

ADEM Admin. Code  
R. 335-3-14-.04

ADEM Admin. Code  
R. 335-3-11-.06(35)

#### *Section 2--Emission Standards*

1. Emission of Volatile Organic Compounds (VOCs) from this Unit No. 4, from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 237 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.
2. This facility shall not emit a weighted average of greater than 0.7 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average among other requirements.

ADEM Admin. Code  
R. 335-3-14-.04(8)

ADEM Admin. Code  
R. 335-3-11-.06(35)  
ADEM Admin. Code  
R. 335-3-14-.01

*Section 3--Compliance and Performance Test Methods and Procedures*

1. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.
2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-1-.04

*Section 4--Emission Monitoring*

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

*Section 5--Recordkeeping and Reporting Requirements*

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:
  - (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
  - (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

ADEM Admin. Code  
R. 335-3-1-.04

- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
  - (d) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
  - (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
  - (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons
  - (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
2. This facility shall maintain records as required in 40 CFR Part §63.800 through §63.808. This record-keeping concerns Subpart JJ--NESHAPs for Wood Furniture Manufacturing Operations.
3. A report summarizing the information in proviso 5.1 and 5.2 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

ADEM Admin. Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-1-.04

## Operating Permit Summary No. 5

**Emission Unit(s):**

Surface Coating Line No. 5

**Description:**

Wooden kitchen cabinet surface coating line

**Type and quantity of fuel used:**

**Primary:** None

**Secondary:** None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	39 TONS OF VOCS PER ROLLING 12 MONTH PERIOD FOR UNIT NO. 5	SYNTHETIC MINOR PSD
HAPs	0.7 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL COATINGS	MACT Subpart JJ REVIEW

## Unit Specific Provisos

### Federally Enforceable Provisos

### Regulations

#### *Section 1--Applicability*

1. This source is subject to a PSD synthetic minor emission limitation.
2. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Wood Furniture Manufacturing Operations as an "Existing Source".

ADEM Admin. Code  
R. 335-3-14-.04

ADEM Admin. Code  
R. 335-3-11-.06(35)

#### *Section 2--Emission Standards*

1. Emission of Volatile Organic Compounds (VOCs) from Unit No. 5, from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 39 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.
2. This facility shall not emit a weighted average of greater than 0.7 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average among other requirements.

ADEM Admin. Code  
R. 335-3-14-.04(8)

ADEM Admin. Code  
R. 335-3-11-.06(35)  
ADEM Admin. Code  
R. 335-3-14-.01

#### *Section 3--Compliance and Performance Test Methods and Procedures*

1. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.
2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.

ADEM Admin. Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-1-.04

**Federally Enforceable Provisos****Regulations***Section 4--Emission Monitoring*

1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.

*Section 5--Recordkeeping and Reporting Requirements*

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

ADEM Admin. Code  
R. 335-3-1-.04

- (d) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

2. This facility shall maintain records as required in 40 CFR Part §63.800 through §63.808. This record-keeping concerns Subpart JJ--NESHAPs for Wood Furniture Manufacturing Operations.

ADEM Admin. Code  
R. 335-3-11-.06(35)

3. A report summarizing the information in proviso 5.1 and 5.2 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

ADEM Admin. Code  
R. 335-3-1-.04



## Operating Permit Summary No. 6

**Emission Unit(s):** Surface Coating Line No. 6

**Description:** Wooden kitchen cabinet surface coating line

**Type and quantity of fuel used:**

**Primary:** None

**Secondary:** None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	110.0 TONS OF VOCS PER ROLLING 12 MONTH PERIOD FOR UNIT NO. 5	SYNTHETIC MINOR PSD
HAPs	0.3 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL COATINGS	MACT Subpart JJ REVIEW
HAPs	0.2 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL ADHESIVES	MACT Subpart JJ REVIEW

**LINE NO. 6**  
**Provisos**

**Regulations**

1. Applicability

1. This source is subject to the applicable requirements of ADEM Admin. Code R 335-3-16-.03, "Major Source Operating Permits".
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-11-.06(35), "National Emission Standards for Wood Furniture Manufacturing Operations" as a "New Source". This source is also subject to the General Provisos as listed in Table 1 of Subpart JJ in 40 CFR Part 63.
3. This source is subject to PSD BACT emission limitations.

ADEM Admin. Code  
R. 335-3-16-.03

ADEM Admin.-Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-14-.04

2. Emission Standards

## Regulations

1. This source is subject to the applicable emissions standards of 40 CFR Part 63 Subpart JJ §63.802 "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.802 (a)(1) through (a)(3).

This facility shall not emit greater than 0.70 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average among other requirements.

This unit (Line No. 6) shall not emit greater than 0.30 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average among other requirements.

If contact adhesives are utilized at this source, the VHAP content of the adhesive shall not exceed 0.20 pounds of VHAP per pound of solids as applied at the applicator.

If strippable spray booth coatings are utilized at this source, the VHAP content of the adhesive shall not exceed 0.80 pounds of VHAP per pound of solids as applied at the applicator.

2. Emission of Volatile Organic Compounds (VOCs) from all surface coating operations for this Unit No. X006 including, but not limited to coating, storage, cleanup, etc., shall not exceed 110.0 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.
3. This facility is subject to the applicable work practice standards of 40 CFR Part 63 Subpart JJ §63.803 "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.803 (a) through (l).

ADEM Admin. Code  
R. 335-3-11-.06(35)

ADEM Admin. Code  
R. 335-3-14-.01

ADEM Admin. Code  
R. 335-3-11-.06(35)

## Regulations

4. This Unit No. X006 is subject to a PSD BACT limitation of utilizing only HVLP or Air Assisted Airless spray technology in applying coatings utilized on this line. ADEM Admin. Code R. 335-3-14-.04(8)
  
5. This Unit No. X006 is subject to a PSD BACT limitation of operating a maximum of 5000 hours per 12 month rolling period on this line. ADEM Admin. Code R. 335-3-14-.04(8)
  
6. This Unit No. X006 is subject to a PSD BACT limitation on coatings utilized on this line. The following are the Monthly Weighted Average VOC content limits for coatings utilized on Line No. 6. ADEM Admin. Code R. 335-3-14-.04(8)
 

Stains	1.58 pounds VOC/ gallon coating
Sealers	0.62 pounds VOC/ gallon coating
Topcoats	2.30 pounds VOC/ gallon coating
Catalysts	1.55 pounds VOC/ gallon coating
  
7. This Unit No. X006 will perform at least daily checks on each booth's PM filters and manometer system. ADEM Admin. Code R. 335-3-14-.04(8)

## Regulations

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| <p>8. This Unit No. X006 shall utilize good work practices that are practically and economically feasible that reasonably minimize clean-up/purge/general solvent usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers. Flushing paint system practices shall include recovering and recycling spent solvents, and minimizing paint and solvent supply hose length.</p> | ADEM Admin. Code<br>R. 335-3-14-.04(8)  |
| <p><u>3. Compliance and Performance Test Methods and Procedures</u></p>  |   |
| <p>1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.</p>   | ADEM Admin. Code<br>R. 335-3-1-.04      |
| <p>2. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.</p>  | ADEM Admin. Code<br>R. 335-3-1-.04      |
| <p>3. This source is subject to the applicable testing methods of 40 CFR Part 63 Subpart JJ §63.805, "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.805 (a).</p>   | ADEM Admin. Code<br>R. 335-3-11-.06(35) |
| <p>4. This source is subject to the applicable compliance procedures of 40 CFR Part 63 Subpart JJ §63.804, "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.804 (a) through (c), (f), and (g).</p>   | ADEM Admin. Code<br>R. 335-3-11-.06(35) |

## Regulations

5. The facility shall use the following equations to calculate as applicable.

ADEM Admin. Code  
R. 335-3-11-.06(35)

To calculate the average VHAP content for finishing operations, the facility shall use the equation presented in 40 CFR 63.804(a)(1).

To calculate VHAP emissions from a finishing material containing styrene or formaldehyde, the facility shall use the methods presented in 40 CFR 63.803(l)(2).

### 4. Emission Monitoring

1. When operating, daily checks on each booth's PM filters and manometer system for Unit No. X006 shall be performed for proper operation. If the PM filters show excess PM coverage, gaps, or other maintenance problems, the PM filters will be corrected as soon as practicable, but no longer than the next stoppage of the line.

ADEM Admin. Code  
R. 335-3-14-.04(8)

2. When operating, daily checks on each booth's PM filters and manometer system for Unit No. X006 shall be performed for proper operation. If the manometers show excess pressure above previously established values or other maintenance problems, the PM filters will be corrected as soon as practicable, but no longer than the next stoppage of the line. The manometers settings will be checked each time the filters are changed on a booth for proper operation and reset as necessary.

ADEM Admin. Code  
R. 335-3-14-.04(8)

3. When operating, daily checks on each booth's coating/flushing system and the mix/paint room supplying the booths for Unit No. X006 shall be performed for proper operation as required in Proviso 2.8. If there are issues with noncompliance with this proviso, it shall be noted in the log and the appropriate paint personnel and their supervisors shall be notified and the situation corrected.

ADEM Admin. Code  
R. 335-3-14-.04(8)

### 5. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection

ADEM Admin. Code  
R. 335-3-1-.04

and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:

(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.

(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(d) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.

(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.

(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

(h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

## Regulations

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|---|---|
| <p>(i) By the 15<sup>th</sup> of the month following the end of each calendar quarter, a written report for the previous three months shall be submitted to the Air Division. The report shall provide the above information, as applicable.</p>  |   |
| <p>2. A log book of the records of Unit No. X006 daily checks on each booth's PM filters and manometer system required in proviso 4.1 and 4.2 shall be retained for at least five years and available for inspection upon request.</p>  | <p>ADEM Admin. Code<br/>R. 335-3-14-.04(8)</p>  |
| <p>3. A log book of the records of Unit No. X006 daily checks on each booth's coating/flushing system and the mix/paint room supplying the booths required in proviso 4.3 shall be retained for at least five years and available for inspection upon request.</p>  | <p>ADEM Admin. Code<br/>R. 335-3-14-.04(8)</p>  |
| <p>4. Records of compliance with Unit No. X006 showing compliance with the PSD BACT limitations on coatings utilized on this line required in Proviso 2.6 shall be maintained in a permanent form suitable for inspection and be available immediately upon request. A monthly summary of the maximum values for each class of coating shall be calculated monthly and submitted at least quarterly by the 15<sup>th</sup> of the month following each quarter.</p> | <p>ADEM Admin. Code<br/>R. 335-3-14-.04(8)</p>  |
| <p>5. A log book of the records of Unit No. X006 hours of operation will be kept every day that this line is in operation and shall be retained for at least five years and available for inspection upon request. A monthly total of the daily calculations shall be calculated monthly and submitted at least quarterly by the 15<sup>th</sup> of the month following each quarter.</p>   | <p>ADEM Admin. Code<br/>R. 335-3-14-.04(8)</p>  |
| <p>6. This source is subject to the applicable recordkeeping requirements of 40 CFR Part 63 Subpart JJ §63.806, "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.806 (a) through (e), and (h) through (j).</p>  | <p>ADEM Admin. Code<br/>R. 335-3-11-.06(35)</p> |
| <p>7. This source is subject to the applicable reporting requirements of 40 CFR Part 63 Subpart JJ §63.807, "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.807 (a) through (c), and (e).</p>  | <p>ADEM Admin. Code<br/>R. 335-3-11-.06(35)</p> |



	<b>Regulations</b>
8. A report summarizing the information in proviso 5.1, 5.2, 5.3, 5.4, 5.5, and 5.6 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.	ADEM Admin. Code R. 335-3-1-.04

## Operating Permit Summary No. 7

**Emission Unit(s):**

Surface Coating Line No. 7

**Description:**

Wooden kitchen cabinet surface coating line

**Type and quantity of fuel used:**

**Primary:** None

**Secondary:** None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	39 TONS OF VOCS PER ROLLING 12 MONTH PERIOD FOR UNIT NO. 7	SYNTHETIC MINOR PSD
HAPs	0.7 LB VHAPs/POUND SOLIDS AT THE APPLICATOR FOR ALL COATINGS	MACT Subpart JJ REVIEW

## Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><i>Section 1--Applicability</i></p> <ol style="list-style-type: none"> <li>1. This source is subject to a PSD synthetic minor emission limitation.</li> <li>2. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Wood Furniture Manufacturing Operations as an "Existing Source".</li> </ol>	<p>ADEM Admin. Code R. 335-3-14-.04</p> <p>ADEM Admin. Code R. 335-3-11-.06(35)</p>
<p><i>Section 2--Emission Standards</i></p> <ol style="list-style-type: none"> <li>1. Emission of Volatile Organic Compounds (VOCs) from Unit No. 7, from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 39 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.</li> <li>2. This facility shall not emit a weighted average of greater than 0.7 pound of VHAPs per pound of solids as delivered to the applicator for all coatings as determined by a monthly average among other requirements.</li> <li>3. This facility shall not emit greater than 1.0 pound of VHAPs per pound of solids as delivered to the applicator for all adhesives among other requirements.</li> </ol>	<p>ADEM Admin. Code R. 335-3-14-.04(8)</p> <p>ADEM Admin. Code R. 335-3-11-.06(35) ADEM Admin. Code R. 335-3-14-.01</p> <p>ADEM Admin. Code R. 335-3-11-.06(35)</p>
<p><i>Section 3--Compliance and Performance Test Methods and Procedures</i></p> <ol style="list-style-type: none"> <li>1. The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.</li> </ol>	<p>ADEM Admin. Code R. 335-3-11-.06(35)</p>

Federally Enforceable Provisos	Regulations
<p>2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>
<p><i>Section 4--Emission Monitoring</i></p>	
<p>1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.</p>	
<p><i>Section 5--Recordkeeping and Reporting Requirements</i></p>	
<p>1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:</p> <ul style="list-style-type: none"> <li>(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.</li> <li>(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.</li> <li>(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.</li> </ul>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

- (d) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

2. This facility shall maintain records as required in 40 CFR Part §63.800 through §63.808. This record-keeping concerns Subpart JJ--NESHAPs for Wood Furniture Manufacturing Operations.

ADEM Admin. Code  
R. 335-3-11-.06(35)

3. A report summarizing the information in proviso 5.1 and 5.2 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

ADEM Admin. Code  
R. 335-3-1-.04

## Operating Permit Summary No. 10

**Emission Unit(s):** Wood Working Operations with Cyclone (s)/  
Baghouse(s)

**Description:** Wood Working Operations with Cyclone (s)/  
Baghouse(s)

**Type and quantity of fuel used:**

Primary: None

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
Opacity	Only one 6-minute average opacity greater than 20% in a 60-minute period; No 6-minute average opacity greater than 40%	SIP
Particulates	$E = 3.59(P^{0.62})$	SIP

## Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><i>Section 1--Applicability</i></p> <ol style="list-style-type: none"> <li>1. This unit is subject to the opacity emission rate limits.</li> <li>2. This unit is subject to the particulate emission rate limits for Process Industries - General sources.</li> </ol>	<p>ADEM Admin. Code R. 335-3-4-.01</p> <p>ADEM Admin. Code R. 335-3-4-.04</p>
<p><i>Section 2--Emission Standards</i></p> <ol style="list-style-type: none"> <li>1. This unit shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.</li> <li>2. This unit shall not discharge into the atmosphere particulate matter in any one hour in excess of <math>E = 3.59 (P^{0.62})</math> where P is the process weight in tons/hr.</li> </ol>	<p>ADEM Admin. Code R. 335-3-4-.01</p> <p>ADEM Admin. Code R. 335-3-4-.04</p>
<p><i>Section 3--Compliance and Performance Test Methods and Procedures</i></p> <ol style="list-style-type: none"> <li>1. Method 9 as defined in 40 CFR 60, Appendix A shall be used in the determination of the opacity of the stack emissions.</li> <li>2. Method 5 as defined in 40 CFR 60, Appendix A shall be used in the determination of particulate emissions from the stack.</li> </ol>	<p>ADEM Admin. Code R. 335-3-1-.05</p> <p>ADEM Admin. Code R. 335-3-1-.05</p>
<p><i>Section 4--Emission Monitoring</i></p> <ol style="list-style-type: none"> <li>1. When operating, the cyclone(s) and baghouse(s) exhaust(s) shall be visually observed a minimum of once weekly for greater than normal visible emissions as determined by previous observations.</li> <li>2. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall</li> </ol>	

be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal.

3. The cyclone(s) and baghouse(s) shall be inspected for proper operation and cleaned at least annually and whenever observed emissions are greater than normal.

#### *Section 5--Recordkeeping and Reporting Requirements*

1. A log book of the weekly visible observations required in proviso 4.1 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.



## Operating Permit Summary No. 20

**Emission Unit(s):** <10 MMBTU/HR Natural Gas Fired Boiler(s)

**Description:** <10 MMBTU/HR Natural Gas Fired Boiler(s)

**Permitted Operating Schedule:** 24 hr/day x 365 days/yr. = 8760 hr/yr.

**Type and quantity of fuel used:**

Primary: Natural Gas

Secondary: None

**Pollutants Emitted:**

Pollutant	Regulatory Emission Limit	Applicable Standard
Opacity	Only one 6-minute average opacity greater than 20% in a 60-minute period; No 6-minute average opacity greater than 40%	SIP
Particulates	$E = 3.59(P^{0.62})$	SIP
HAPS	Work Practice Standard to include tune-ups	MACT DDDD

## Unit Specific Provisos

### Federally Enforceable Provisos

### Regulations

#### *Section 1--Applicability*

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| 1. This unit is subject to the opacity emission rate limits.   | ADEM Admin. Code<br>R. 335-3-4-.01       |
| 2. This unit is subject to the particulate emission rate limits for Process Industries - General sources.  | ADEM Admin. Code<br>R. 335-3-4-.04       |
| 3. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions for Industrial, Commercial, and Institutional Boilers and Process Heaters as an "Existing Source". | ADEM Admin. Code<br>R. 335-3-11-.06(107) |

#### *Section 2--Emission Standards*

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| 1. This unit shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.  | ADEM Admin. Code<br>R. 335-3-4-.01       |
| 2. This unit shall not discharge into the atmosphere particulate matter in any one hour in excess of $E = 3.59 (P^{0.62})$ where P is the process weight in tons/hr.   | ADEM Admin. Code<br>R. 335-3-4-.04       |
| 3. The boilers are subject to the National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDD). The permittee will conduct a tune-up of the boiler or process heater every five years as specified in § 63.7540. This tune-up shall be conducted as a work practice for all regulated emissions under this subpart. | ADEM Admin. Code<br>R. 335-3-11-.06(107) |

#### *Section 3--Compliance and Performance Test Methods and Procedures*

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| 1. Method 9 as defined in 40 CFR 60, Appendix A shall be | ADEM Admin. Code |
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used in the determination of the opacity of the stack emissions.

R. 335-3-1-.05

2. Method 5 as defined in 40 CFR 60, Appendix A shall be used in the determination of particulate emissions from the stack.

ADEM Admin. Code  
R. 335-3-1-.05

#### *Section 4--Emission Monitoring*

1. None.

#### *Section 5--Recordkeeping and Reporting Requirements*

1. Records of the annual tune-up of the boiler as specified in § 63.7540 and one-time energy assessment performed by a qualified energy assessor as per 40CFR Part 63 Table 3 to subpart DDDDD shall be kept in permanent form suitable for inspection. The records shall be retained for at least five years from the date of generation and available upon request. Conduct burner tune-up of the boiler to demonstrate continuous compliance specified in § 63.7540 no later than January 31, 2016.

ADEM Admin. Code  
R. 335-3-11-.06(107)

If burner rating >10 MMBtu/hr, tune up required annually;

If burner rating <10 MMBtu/hr but greater than 5 MMBtu/hr, tune up required every 2 years;

If burner rating < 5 MMBtu/hr, tune up required every 5 years;

2. Records of the process heater tune-ups as specified in § 63.7540 as per 40CFR Part 63 subpart DDDDD shall be kept in permanent form suitable for inspection. The records shall be retained for at least five years from the date of generation and available upon request.

ADEM Admin. Code  
R. 335-3-11-.06(107)

Conduct burner tune-up of the process heaters to demonstrate continuous compliance specified in § 63.7540 no later than January 31, 2016.

If burner rating >10 MMBtu/hr, tune up required annually;

If burner rating <10 MMBtu/hr but greater than 5 MMBtu/hr, tune up required every 2 years;

If burner rating < 5 MMBtu/hr, tune up required every 5 years;

