

STATEMENT OF BASIS (SOB)
WELLBORN CABINETS, INC.
Ashland, Alabama
Facility No. 304-S008

Wellborn Cabinets, INC. has applied for renewal of Major Source Operating Permit (MSOP) No. 304-S008. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Admin. Code r. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of the permit.

The facility was originally constructed in 1972. The initial Title V MSOP was issued on October 7, 2003, and this is the fourth renewal. The current MSOP was issued on January 10, 2019, modified on March 15, 2020, and expires on October 7, 2023. The renewal application was received on April 3, 2023.

The facility is located in Clay County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS). Emissions from this facility are calculated using material balance, stack testing data, Best Achievable Control Technology limits, vendor guarantees, Maximum Achievable Control Technology limits, and AP-42 factors. These factors and methods of calculation represent the best available estimates for emissions.

There are no current or ongoing enforcement actions against Wellborn necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL110000604971).

The current MSOP consists of:

Unit #001: Wooden furniture surface coating overhead Line No. 1

Unit #002: Wooden furniture surface coating overhead Line No. 2

Unit #003: Wooden furniture surface coating overhead Line No. 3

Unit #004: Wooden furniture surface coating Flat Line No. 4

Unit #005: Wooden furniture surface coating Flat Line No. 5

Unit #006: Wooden furniture surface coating UV Panel Coater No. 6

Unit #007: Wooden furniture surface coating UV Mold Coater No. 7

Unit #008: Automated Reciprocating Sprayer (ARS) with Electrical Oven No. 8

Unit #010: Wood Furniture Adhesion Operations Line No. 10

Unit #011: Two ASLs with Regenerative Thermal Oxidizer (RTO-1) and Baghouse No. 3

Unit #021: 29.5 MMBTU/hr Wood Waste Boiler No. 1 with Electrostatic Precipitator (ESP) Control Device

Unit #022: 29.5 MMBTU/hr Wood Waste Boiler No. 2 with Electrostatic Precipitator (ESP) Control Device

Unit #023: 29.5 MMBTU/hr Wood Waste Boiler No. 3 with Electrostatic Precipitator (ESP) Control Device

Unit #024: 15.0 MMBTU/hr Wood Waste Boiler #4 with Multicyclone and ESP

Unit #025: 12.6 MMBtu/hr Natural Gas Fired Boiler #5

Unit #031: MISC. Storage Tanks

Unit #032: Wood Waste Handling Systems

Unit #033: Lumber Kilns

Unit #034: Sawmill Operations

Unit #035: Concrete Batch Plant

Unit #037: Panel Saw Wood Working Operations

Unit #040: Re-Saw Operations

The air permits for the following units will be incorporated into this MSOP:

Unit #012: Two ASLs with Regenerative Thermal Oxidizer (RTO-2) and Baghouse No. 3

Unit #038: Lumber Planing and Cutting Line with Baghouse No. 13

Changes to the Title V include updating the language of general permit proviso No. 18 for fugitive dust to better reflect Department policy, the requirement of stack testing every five years for all control devices, clarification of the type of fuel used in Units 21-23 for the purposes of 40 CFR Part 63 Subpart DDDDD, and general updates to language and terminology throughout the permit.

A major change to the Title V includes altering the carbon monoxide (CO) limits for Units 21-23 to correctly correspond with the operating scenarios and fuel type used. Based on data submitted by the facility and research performed by the Department, it has been determined that the boilers

should be classified as stokers designed to burn wet biomass fuel. The boilers were previously classified as stokers designed to burn dry biomass fuel. The CO limits will change from 460 to 1,100 PPM of CO adjusted to 3% oxygen.

EMISSIONS:

The facility is a major source with respect to Title V and the Prevention of Significant Deterioration (PSD) for volatile organic compounds (VOCs). The greenhouse gas (GHG) emissions from the facility do not exceed major source thresholds.

This facility will maintain its facility-wide VOC emissions limitation of 717 tons per year (TPY) as well as the unit specific emissions limitations described in the operations section below.

OPERATIONS:

This facility's SIC Code is 2434, and their NAICS Code is 337110. This facility operates 4,000 hours a year.

Each of the significant emission units is described below:

Permit Unit No. X001 – Wooden furniture surface coating overhead Line No. 1

Overview

This unit does not currently operate but contains eight booths of different types and three drying ovens.

This process was initially permitted in Air Permit 304-S008-X002 on June 11, 1992. It was then re-permitted under the PSD program with PSD Air Permit 304-S008-X002 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

The combined VOC emissions from the entire facility are limited to 717 tons per year in order to stay below the PSD best available control technology (BACT) limit. This limit was established in PSD Air Permit 304-S008-X009 issued on April 18, 2006, which was subsequently incorporated into the Title V permit on October 8, 2008. VOC emissions are also limited by the PSD BACT

limit on the maximum and monthly average lbs VOC / gal coating and by limits on the minimum transfer efficiency demonstrated by Wellborn’s applicators. These limits were established by the initial PSD Air Permit and also incorporated into the Title V with the 2008 issuance.

| Coating Type | Maximum content (lb-VOC/gal- coating) | Monthly Average (lb-VOC/gal- coating) |
|--------------|---------------------------------------|---------------------------------------|
| UV Coatings | 0.11 | 0.11 |
| Stains | 7.20 | 6.80 |
| Sealers | 5.00 | 4.50 |
| Topcoats | 7.20 | 5.00 |
| Toners | 4.30 | 4.15 |
| Glazes | 6.50 | 6.35 |

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations”, Wellborn shall not emit greater than 0.8 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X002 – Wooden furniture surface coating overhead Line No. 2

Overview

This unit currently operates with six stain booths, seven sealer booths, two topcoat booths, one toner booth, two glaze booths, and three drying ovens. It is subject to identical requirements to Permit Unit No. X001.

This process was initially permitted in Air Permit 304-S008-X003 on June 11, 1992. It was then re-permitted under the PSD program with PSD Air Permit 304-S008-X002 on July 26, 1995. The requirements and limits for this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

The combined VOC emissions from the entire facility are limited to 717 tons per year in order to stay below the PSD BACT limit. This limit was established in PSD Air Permit 304-S008-X009 issued on April 18, 2006, which was subsequently incorporated into the Title V permit on October 8, 2008. VOC emissions are also limited by the PSD BACT limit on the maximum and monthly average lbs VOC / gal coating and by limits on the minimum transfer efficiency demonstrated by Wellborn's applicators. These limits were established by the initial PSD Air Permit and also incorporated into the Title V with the 2008 issuance.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: "National Emission Standards for Wood Furniture Manufacturing Operations", Wellborn's shall not emit greater than 0.8 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e).

Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X003 – Wooden furniture surface coating overhead Line No. 3

Overview

This unit currently operates with five stain booths, seven sealer booths, two topcoat booths, two glaze booths, and three drying ovens. It is subject to identical requirements to Permit Unit No. X001.

This process was initially permitted in Air Permit 304-S008-X004 on June 11, 1992. It was then re-permitted under the PSD program with PSD Air Permit 304-S008-X002 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

The combined VOC emissions from the entire facility are limited to 717 tons per year in order to stay below the PSD BACT limit. This limit was established in PSD Air Permit 304-S008-X009 issued on April 18, 2006, which was subsequently incorporated into the Title V permit on October 8, 2008. VOC emissions are also limited by the PSD BACT limit on the maximum and monthly average lbs VOC / gal coating and by limits on the minimum transfer efficiency demonstrated by Wellborn's applicators. These limits were established by the initial PSD Air Permit and also incorporated into the Title V with the 2008 issuance.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: "National Emission Standards for Wood Furniture Manufacturing Operations", Wellborn's shall not emit greater than 0.8 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average. T

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X004 – Wooden furniture surface coating Flat Line

Overview

This unit currently operates with one stain booth, one sealer booth, one topcoat booth, and two drying ovens. It is subject to identical requirements to Permit Unit No. X001.

This process was initially permitted under the PSD program with PSD Air Permit 304-S008-X004 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

The combined VOC emissions from the entire facility are limited to 717 tons per year in order to stay below the PSD BACT limit. This limit was established in PSD Air Permit 304-S008-X009 issued on April 18, 2006, which was subsequently incorporated into the Title V permit on October 8, 2008. VOC emissions are also limited by the PSD BACT limit on the maximum and monthly average lbs VOC / gal coating and by limits on the minimum transfer efficiency demonstrated by Wellborn’s applicators. These limits were established by the initial PSD Air Permit and also incorporated into the Title V with the 2008 issuance.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations”, Wellborn’s shall not emit greater than 0.8 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average. T

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X005 – Wooden furniture surface coating Flat Line

Overview

This unit currently operates with one stain booth, one sealer booth, one topcoat booth, and one drying oven. It is subject to identical requirements to Permit Unit No. X001.

This process was initially permitted under the PSD program with PSD Air Permit 304-S008-X006 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

The combined VOC emissions from the entire facility are limited to 717 tons per year in order to stay below the PSD BACT limit. This limit was established in PSD Air Permit 304-S008-X009 issued on April 18, 2006, which was subsequently incorporated into the Title V permit on October 8, 2008. VOC emissions are also limited by the PSD BACT limit on the maximum and monthly average lbs VOC / gal coating and by limits on the minimum transfer efficiency demonstrated by Wellborn's applicators. These limits were established by the initial PSD Air Permit and also incorporated into the Title V with the 2008 issuance.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: "National Emission Standards for Wood Furniture Manufacturing Operations", Wellborn's shall not emit greater than 0.8 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: "National Emission Standards for Wood Furniture Manufacturing Operations" to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X006 – Wooden furniture surface coating UV Panel Coater

Overview

This unit currently operates with two sealer areas, one topcoat area, and one UV curing oven.

This process was initially permitted under the PSD program with PSD Air Permit 304-S008-X007 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003. This unit was initially subject to identical requirements to Permit Unit No. X001, but these limits were altered with the first Title V renewal.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X007 – Wooden furniture surface coating UV Mold Coater

Overview

This unit currently operates with two topcoat areas, and one UV curing oven.

This process was initially permitted under the PSD program with PSD Air Permit 304-S008-X008 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003. This unit was initially subject to identical requirements to Permit Unit No. X001, but these limits were altered with the first Title V renewal.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X008 – Wooden furniture surface coating ARS Booth with Steam and Electric ovens

Overview

This unit currently operates with one automated reciprocating sprayer (ARS), one steam oven, and one electric oven.

This process was initially permitted in Air Permit 304-S008-X008 on November 15, 2015. All requirements and limitations from this permit were incorporated into the Title V permit on January 10, 2019.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

This unit received a synthetic minor PSD limit of 39.9 TPY for VOCs.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations”, Wellborn’s shall not emit greater than 0.8 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X010 – Wooden furniture surface coating Adhesion Operations

Overview

This unit currently encompasses all adhesion operations at the facility.

Applied limits were included in the Title V Permit during the first renewal under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOC)

The combined VOC emissions from the entire facility are limited to 717 tons per year in order to stay below the PSD BACT limit. This limit was established in PSD Air Permit 304-S008-X009 issued on April 18, 2006, which was subsequently incorporated into the Title V permit on October 8, 2008.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations”, Wellborn’s shall not emit greater than 0.2 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to

include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X011 – Two Automated Spray Lines (ASL) with RTO-1 and Existing Baghouse #3

Overview

This unit currently operates with two ASLs, RTO-1, and one baghouse.

This process was initially permitted in Air Permit 304-S008-X011 on July 20, 2018. All requirements and limitations from this permit were incorporated into the modified Title V permit on May 15, 2020.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a synthetic minor PSD limit 24.5, 14.5, and 9.5 TPY for PM, PM10, and PM2.5, respectively.

Volatile Organic Compounds (VOC)

This unit received a synthetic minor PSD limit of 39.5 TPY for VOCs.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations”, Wellborn’s shall not emit greater than 1.0 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X012 – Two Automated Spray Lines (ASL) with RTO-2 and Existing Baghouse #3

Overview

This unit currently operates with two ASLs, RTO-2, and one baghouse.

This process was initially permitted in Air Permit 304-S008-X012 on September 11, 2023. All requirements and limitations from this permit are being incorporated into the fourth Title V permit renewal.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a synthetic minor PSD limit 24.5, 14.5, and 9.5 TPY for PM, PM10, and PM2.5 respectively.

Volatile Organic Compounds (VOC)

This unit received a synthetic minor PSD limit of 39.5 TPY for VOCs.

Hazardous Air Pollutants (HAPs)

In order to comply with 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations”, Wellborn’s shall not emit greater than 1.0 lbs HAP / lbs solids delivered to the applicator for all coatings as determined by a monthly average.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years.

Permit Unit No. X021 – 29.5 MMBTU/hr Wood Waste Fired Boiler #1

Overview

This process was initially permitted under the PSD program with PSD Air Permit 304-S008-X0011 on July 26, 1995. All requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Carbon Monoxide (CO)

This unit received a PSD BACT limit for CO of 23.6 lb/hr or 0.400 lb/MMBTU.

Per 40 CFR, Part 63, Subpart DDDDD, CO is limited to 1,100 PPM at 3% oxygen. This is based on the boiler being classified as a stoker and burning wet biomass fuel.

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a PSD BACT limit for PM of 5.69 lb/hr or 0.0390 grains/DSCF, and for PM10 of 3.41 lb/hr or 0.0270 grains/DSCF.

Per 40 CFR, Part 63, Subpart DDDDD, Filterable PM is limited to 0.043 lb/MMBTU of steam output.

Opacity for this unit is capped at 10% without a wet scrubber.

Volatile Organic Compounds (VOC)

This unit received a PSD BACT limit for VOCs of 9.0 lb/hr.

Hazardous Air Pollutants (HAPs)

Per 40 CFR, Part 63, Subpart DDDDD, HCl is limited to 0.022 lb/MMBTU of heat input.

Per 40 CFR, Part 63, Subpart DDDDD, Mercury is limited to 0.000057 lb/MMBTU of heat input.

Sulfur Compounds

This unit received a PSD BACT limit for Sulfur Dioxide (SO₂) of 9.0 lb/hr.

Nitrogen Oxides (NO_x)

This unit received a PSD BACT limit for NO_x of 14.75 lb/hr or 0.5 lb/MMBTU.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

A Continuous Opacity Monitoring System and a Continuous Oxygen Monitoring System will be required to be operated at all times on the boilers' common stack.

Monthly visible observations are required on the Electrostatic Precipitator (ESP), cyclones, hoppers, and piping.

General Pollutant monitoring

Annual stack tests are required to be performed on the unit to ensure compliance with the above limits. If two consecutive annual tests are less than 75% of the applicable limit, testing can be reduced to once every three years for that pollutant.

Permit Unit No. X022 – 29.5 MMBTU/hr Wood Waste Fired Boiler #2

Overview

This process was initially permitted under the PSD program with PSD Air Permit 304-S008-X0011 on July 26, 1995. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003.

Emission Standards/Limitations

Carbon Monoxide (CO)

Per 40 CFR, Part 63, Subpart DDDDD, CO is limited to 1,100 PPM at 3% oxygen. This is based on the boiler being classified as a stoker and burning wet biomass fuel.

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a PSD BACT limit for PM of 5.69 lb/hr or 0.0390 grains/DSCF.

This unit received a PSD BACT limit for PM10 of 3.41 lb/hr or 0.0270 grains/DSCF.

Per 40 CFR, Part 63, Subpart DDDDD, Filterable PM is limited to 0.043 lb/MMBTU of steam output.

Opacity for this unit is capped at 10% without a wet scrubber.

Volatile Organic Compounds (VOC)

This unit received a PSD BACT limit for VOCs of 9.0 lb/hr.

Hazardous Air Pollutants (HAPs)

Per 40 CFR, Part 63, Subpart DDDDD, HCl is limited to 0.022 lb/MMBTU of heat input and mercury is limited to 0.000057 lb/MMBTU of heat input.

Sulfur Compounds

This unit received a PSD BACT limit for Sulfur Dioxide (SO₂) of 9.0 lb/hr.

Nitrogen Oxides (NO_x)

This unit received a PSD BACT limit for NO_x of 14.75 lb/hr or 0.5 lb/MMBTU.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

A Continuous Opacity Monitoring System and a Continuous Oxygen Monitoring System will be required to be operated at all times on the boilers' common stack.

Monthly visible observations are required on the electrostatic precipitator (ESP), cyclones, hoppers, and piping.

General Pollutant monitoring

Annual stack tests are required to be performed on the unit to ensure compliance with the above limits. If two consecutive annual tests are less than 75% of the applicable limit, testing can be reduced to once every three years for that pollutant.

Permit Unit No. X023 – 29.5 MMBTU/hr Wood Waste Fired Boiler #3

Overview

All applied limits below were included in the initial Title V Permit that was issued on October 8, 2003 under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, "Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements."

Emission Standards/Limitations

Carbon Monoxide (CO)

This unit received a Synthetic Minor PSD limit for CO of 20.53 lb/hr.

Per 40 CFR, Part 63, Subpart DDDDD, CO is limited to 1,100 PPM at 3% oxygen. This is based on the boiler being classified as a stoker and burning wet biomass fuel.

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 24.9 TPY and for PM10 of 14.9 TPY.

Per 40 CFR, Part 63, Subpart DDDDD, Filterable PM is limited to 0.039 lb/MMBTU of steam output.

Opacity for this unit is capped at 10% without a wet scrubber.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisos and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

Per 40 CFR, Part 63, Subpart DDDDD, HCl is limited to 0.022 lb/MMBTU of heat input and mercury is limited to 0.000057 lb/MMBTU of heat input.

Sulfur Compounds

Per 40 CFR, Part 63, Subpart DDDDD, Sulfur Dioxide (SO₂) is limited to 5 micrograms/cubic meter/hr.

Nitrogen Oxides (NO_x)

This unit received a Synthetic Minor PSD limit for NO_x of 14.75 lb/hr or 0.5 lb/MMBTU.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

A Continuous Opacity Monitoring System and a Continuous Oxygen Monitoring System will be required to be operated at all times on the boilers' common stack.

Monthly visible observations are required on the Electrostatic Precipitator (ESP), cyclones, hoppers, and piping.

General Pollutant monitoring

Annual stack tests are required to be performed on the unit to ensure compliance with the above limits. If two consecutive annual tests are less than 75% of the applicable limit, testing can be reduced to once every three years for that pollutant.

Permit Unit No. X024 – 15.0 MMBTU/hr Wood Waste Fired Boiler #4

Overview

This process was initially permitted under Air Permit 304-S008-X010 on March 1, 1994. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003. This unit has not seen use in several years and is currently disconnected from the ESP.

Emission Standards/Limitations

Carbon Monoxide (CO)

This unit received a Synthetic Minor PSD limit for CO of 22.60 lb/hr.

Per 40 CFR, Part 63, Subpart DDDDD, CO is limited to 1,100 PPM at 3% oxygen. This is based on the boiler being classified as a stoker and burning wet biomass fuel.

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 2.96 lb/hr and for PM10 of 1.58 lb/hr.

Per 40 CFR, Part 63, Subpart DDDDD, Filterable PM is limited to 0.043 lb/MMBTU of steam output.

Opacity for this unit is capped at 10% without a wet scrubber.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

Per 40 CFR, Part 63, Subpart DDDDD, HCl is limited to 0.022 lb/MMBTU of heat input and mercury is limited to 0.000057 lb/MMBTU of heat input.

Sulfur Compounds

Per 40 CFR, Part 63, Subpart DDDDD, Sulfur Dioxide (SO₂) is limited to 5 micrograms/cubic meter/hr.

Nitrogen Oxides (NO_x)

This unit received a Synthetic Minor PSD limit for NO_x of 8.9 lb/hr.

Periodic Monitoring

If this unit is reconnected to the combined boiler stack, as would be required to maintain compliance with permitted limits, it would be monitored by the same equipment that monitors the other boilers, and subject to the same monitoring requirements.

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

A Continuous Opacity Monitoring System and a Continuous Oxygen Monitoring System will be required to be operated at all times.

Monthly visible observations are required on the Electrostatic Precipitator (ESP), cyclones, hoppers, and piping.

General Pollutant monitoring

Annual stack tests are required to be performed on the unit to ensure compliance with the above limits. If two consecutive annual tests are less than 75% of the applicable limit, testing can be reduced to once every three years for that pollutant.

Permit Unit No. X025 – 12.6 MMBTU/hr Natural Gas Fired Boiler #5

Overview

This process was initially permitted under Air Permit 304-S008-X009 on April 16, 1993. The requirements and limitations from this permit were incorporated into the initial Title V permit on October 8, 2003. This unit does not see regular use as it is a make-up steam boiler for times of high production or if another boiler goes offline.

Emission Standards/Limitations

Carbon Monoxide (CO)

This unit received a Synthetic Minor PSD limit for CO of 0.50 lb/hr.

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 0.12 lb/hr and for PM10 of 0.07 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Nitrogen Oxides (NOx)

This unit received a Synthetic Minor PSD limit for NOx of 2.0 lb/hr.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Records of daily fuel usage must be kept in a form suitable for inspection.

Permit Unit No. X031 – Miscellaneous Storage Tanks

Overview

All applied limits were included in the initial Title V Permit issued on October 8, 2003 under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Volatile Organic Compounds (VOC)

Several of the permitted storage tanks are over 1,000 gallons and must comply with ADEM Admin. Code R. 335-3-6-.03 (2). Compliance is maintained by installing and operating a vapor control device.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Records will be kept of the contents of each tank in a form suitable for inspection.

Permit Unit No. X032 – Wood Waste Handling Systems

Overview

All applied limits were included in the initial Title V Permit issued on October 8, 2003 under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 2.60 lb/hr and for PM10 of 1.75 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Permit Unit No. X033 – Lumber Kilns

Overview

This unit contains 15 lumber kilns for drying wood prior to processing.

All applied limits were included in the initial Title V Permit under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Volatile Organic Compounds (VOC)

Records of VOC emissions from this unit must be kept in a permanent form suitable for inspection.

Permit Unit No. X034 – Saw Mill Operations

Overview

This unit contains several saws, one screen, one hogger, one hopper, and one silo.

All applied limits were included in the initial Title V Permit issued on October 8, 2003 under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 2.60 lb/hr and for PM10 of 1.75 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Permit Unit No. X035 – Concrete Batch Plant

Overview

This unit contains one concrete batch plant and two baghouses.

All applied limits were included in the initial Title V Permit issued on October 8, 2003 under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 2.60 lb/hr and for PM10 of 1.75 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisos and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisos and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall

be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Permit Unit No. X037 – Pannel Saw Wood Working Operations

Overview

This unit contains several saws, one cyclone, and two baghouses.

All applied limits were included in the initial Title V Permit issued on October 8, 2003 under Alabama Admin. Code R. 335-3-16-.01(1)(i) & 335-3-16-.06(1) and guidance from EPA found in 57 Federal Register 32250, 32279 (July 21, 1992) which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 3.12 lb/hr and for PM10 of 3.12 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisos and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisos and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

Permit Unit No. X038 – Lumber Planing and Cutting Line with Baghouse No. 13

Overview

This unit contains several saws, one cyclone, and one baghouse.

This process was initially permitted under Air Permit 304-S008-X038 on January 6, 2020. The requirements and limitations from this permit are being incorporated into this fourth Title V permit renewal.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 2.5 lb/hr, for PM10 of 1.5 lb/hr, and for PM2.5 of 1.0 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks.

Permit Unit No. X040 – Re Saw Operations

Overview

This unit contains several saws, one cyclone, and one baghouse.

This process was initially permitted in Air Permit 304-S008-X040, which was issued on August 13, 2007. The requirements and limitations from this permit were incorporated into the first Title V permit renewal on October 8, 2008.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

This unit received a Synthetic Minor PSD limit for PM of 3.3 lb/hr and for PM10 of 3.3 lb/hr.

Volatile Organic Compounds (VOC)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Hazardous Air Pollutants (HAPs)

This source is subject to no additional specific requirements other than general permit provisions and facility wide PSD BACT limits.

Periodic Monitoring

Opacity and PM

Daily visible observations are required on all stacks. If visible emissions are observed, the facility shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of observation of the visible emissions, and an additional instantaneous visible emissions check shall be performed after corrective action is complete to ensure that the visible emissions have been eliminated.

REPORTING REQUIREMENTS:

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart JJ: “National Emission Standards for Wood Furniture Manufacturing Operations” to include §63.806 (a) through (e), and (h) through (j) as well as §63.807 (a) through (c), and (e). Wellborn must also keep accurate and understandable records of their consumption of VOC and HAP containing materials for at least five years and will submit their data on their current rolling 12-month VOC and HAP emissions to the Department in quarterly reports.

Wellborn is subject to the recordkeeping and reporting requirements laid out in 40 CFR Part 63 Subpart DDDDD: “National Emission Standards for Hazardous Air Pollutants for Major Sources:

Industrial, Commercial, and Institutional Boilers and Process Heaters” and will submit data on the daily steam flow recordings, the daily PM and PM10 emissions calculations, the monthly total on PM and PM10 emissions, and the rolling consecutive 12-month totals of PM and PM10 emissions for each boiler.

PERMITTING FEES:

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.

FUGITIVE DUST:

All plant roads are paved or graveled. There are no raw materials, storage piles, products, etc. capable of generating fugitive dust at this facility. Therefore, additional specific requirements for fugitive dust are not necessary for this facility.

ENVIRONMENTAL JUSTICE:

An Environmental Justice analysis was performed utilizing EPAs EJSCREEN tool and the Council on Environmental Quality’s (CEQ) Climate and Economic Justice screening tool (Justice 40). This permit is for an existing facility, and no modifications or increases in emissions will result from the issuance of this permit; therefore, it was determined that enhanced outreach is not necessary.

RECOMMENDATION

Based on the above analysis, I recommend that this facility’s MSOP be renewed pending the 30-day public notice and EPA’s 45-day review.

Christopher Nuckels
Chemical Branch
Air Division

January 3, 2024
Date

CTN/ctn