

**STATEMENT OF BASIS**  
**JIM BISHOP CABINETS, INC.**  
**Facility No. 209-0038**  
**Montgomery, Alabama**

On April 28, 2021, Jim Bishop Cabinets submitted their fourth renewal Major Source Operating Permit (MSOP) application for review. The current MSOP expiration date is December 3, 2021. Jim Bishop Cabinets is currently subject to 40 CFR Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

There are no current or ongoing enforcement actions against Jim Bishop Cabinets necessitating additional requirements to achieve compliance with permit conditions. Montgomery County is currently listed in attainment with all National Ambient Air Quality Standards (NAAQS).

**OPERATIONS:**

Jim Bishop Cabinets is a manufacturer of wooden cabinets and their operations consist of woodworking, surface coating, and assembly. This facility generally operates 16 hours, 5 days a week for approximately 4,000 hours per year, and their SIC and NAICS Codes are #2434 and #337110, respectively.

**MSOP's Units 001, 002 and 003:**

**001:** Wood Cabinet Surface Coating Line and Assembly: Four (stain/paint, sealer, glaze and topcoat) manually operated spray booths and a 2.80 MMBtu/hr natural gas-fired drying oven

**002:** Woodworking Operations with Baghouses Nos. 01 and 02

**003:** One Off-Line Surface Coating Booth

The incoming wood products such as plywood, particle board, hard board and fiberboard are conveyed to the woodworking operations that consist of cutting, drilling and sanding. The wood waste particulate matter (PM) emissions are exhausted to two baghouses for disposal, this operation is permitted under Unit 002. The finished wood components are then conveyed to the surface coating lines, which are permitted under Units 001 and 003.

**EMISSIONS / REQUIRMENT:**

Jim Bishop Cabinets' PM emissions are regulated under ADEM Rules 335-3-4-.04, Process Industries - General. This facility is considered a Class 1 County Source and its allowable PM emissions are 20.22 tpy, using  $E = 3.59P^{0.62}$ , where ( $P \leq 30$  tons/hr). Their PM emissions from the woodworking operations are conveyed to one of the two reverse-air baghouses. The baghouses are designed to have removal efficiencies of > 99.8, 97.0 and 95.0% for the PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions, respectively. The wood waste is collected in dumpsters and disposed of off-site at a local landfill.

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

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

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

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

### **Monitoring of Emissions**

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

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

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

**Permitting Fees**

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

**Affected States Notification**

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

**Environmental Justice**

ADEM utilized EPA's EJSCREEN screening tool to help identify areas that may warrant additional consideration, analysis, or outreach (see EJSCREEN Report).

**RECOMMENDATIONS:**

Based on the above analysis, I recommend renewing Jim Bishop Cabinets' current MSOP, pending an e-Notice period and EPA review. Their renewal MSOP will consist of Units 001, 002 and 003. Jim Bishop Cabinets will be required to maintain and submit quarterly emissions reports to this Department and continue to comply with 40 CFR 63 Subpart JJ - MACT standard requirements.

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Clarence Fairer III  
Chemical Branch  
Air Division

September 16, 2021  
Date