

Statement of Basis
Wellborn Forest Products
(Woodworking & Surface Coating Processes)
310-0011

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

Introduction

Wellborn Forest Products, Inc. (WF Cabinetry), (Wellborn Forest) has applied for renewal of Major Source Operating Permit (MSOP) No. 310-0011. 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 (Department), in accordance with the terms and conditions of the permit.

The initial Title V MSOP was issued on September 1, 2000, and this is the fifth renewal. The current MSOP expires on August 31, 2025. The renewal application was received on December 12, 2024.

The facility is located in Tallapoosa County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Wellborn Forest 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 AL0000000112300011).

This facility's operations include the manufacture and surface coating of wooden kitchen cabinets (SIC # 2434). The facility's main operations include surface coating, assembly and adhesion operations, and woodworking operations. Based on the Title V permit application, this facility is a major source for Title V standards for volatile organic compounds (VOCs) and hazardous air pollutants (HAP). This facility is a major source for Prevention of Significant Deterioration (PSD) purposes.

Since their last Title V application, a new baghouse operation has been added to replace an existing operation, and no units have been removed from the plant.

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

Permit Unit No.	Description of Unit
001	Woodworking Operations with Baghouse
004	Adhesion Operations
007	Conventional System Coating Line (a,b,c,d)
009	Automated Surface Coating Flat Line (a,b)

Surface Coating Operations

Following the woodworking operations, the wood is then conveyed to the surface coating lines, which have several coating lines consisting of spray booths (which typically consist of stain booths, a drying tunnel, sealer booths, topcoat booths, and drying ovens).

The Conventional System Coating Line and the adhesion operations are currently subject to 245 tons per year of VOCs. This limit was established in the Air Permit issued on March 30, 2017. The Miscellaneous Coating Booths Line is also included in this limit and was issued an Air Permit on November 8, 2017. This limit was subsequently incorporated into the Title V permit issued on September 1, 2020.

The Automatic Surface Coating Line is currently subject to an additional 245 tons per year of VOCs. This limit was established in the Air Permit issued on May 22, 2019. This limit was subsequently incorporated into the Title V permit issued on September 1, 2020.

Applicable Regulations

The coating lines are all subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Wood Furniture, Subpart JJ in 40 CFR Part 63.800. This regulation requires Wellborn Forest to limit emissions of certain HAPs in their coatings and to implement certain work practices and training for operators.

Testing of Emissions

No periodic testing of emissions is required. Wellborn Forest uses manufacturer's information based on Method 24 or 311 (as appropriate) for the coatings used in coating operations.

Monitoring of Emissions

The coating lines are all subject to the NESHAP for the Manufacture of Wood Furniture, Subpart JJ in 40 CFR Part 63.800. Wellborn Forest will maintain records of monthly coating usage and coating analysis for each line to show compliance with these requirements. These will be submitted quarterly.

The facility is subject to PSD synthetic minor emission limitations. The facility will maintain records of monthly coating usage and coating analysis for each line to show compliance with these requirements. A report detailing these records will be submitted quarterly.

Wellborn Forest utilizes only natural gas as a fuel for the space heaters and a 6.3 MMBtu/hr boiler and also uses infrared ovens. The use of natural gas will minimize emissions of particulate matter (PM) and sulfur dioxide (SO₂). Due to the inherently low particulate and SO₂ emissions using this fuel, no periodic monitoring will be required. The use of small burners for the ovens will minimize the emissions of nitrogen oxides (NO_x). Therefore, no emission monitoring will be required for this pollutant.

Carbon monoxide (CO) emissions are typically elevated inversely to NO_x emissions, meaning efforts to reduce NO_x emissions will generally increase CO emissions. For the small size of the units at the facility, CO controls would be infeasible, and possibly counterproductive to the control of NO_x.

The stacks associated with these sources shall not exhibit greater than 20% opacity. Due to the use of natural gas on all the burners and PM filters controls on the stacks, it is unlikely that visible opacity would be emitted.

Assembly and Adhesion Operations

Following various operations, the wood pieces are assembled with adhesives and fasteners.

The Conventional System Coating Line and the assembly and adhesion operations are currently subject to 245 tons per year of VOCs. This limit was established in the Title V permit issued on September 1, 2000.

Applicable Regulations

The adhesives are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Wood Furniture, Subpart JJ in 40 CFR Part 63.800. This regulation requires Kith to limit emissions of certain HAPs in their adhesives.

The facility is subject to PSD synthetic minor emission limitations. The facility will maintain records of monthly coating usage and coating analysis for each line to show compliance with these requirements. A report detailing these records will be submitted quarterly.

Testing of Emissions

No periodic testing of emissions is required. Wellborn Forest uses manufacture's information based on Method 311 as appropriate for the adhesives.

Monitoring of Emissions

The adhesive operations are subject to the NESHAP for the Manufacture of Wood Furniture, Subpart JJ in 40 CFR Part 63.800. Wellborn Forest will maintain records of monthly adhesive usage and adhesive analysis to show compliance with these requirements. These will be submitted quarterly.

The facility is subject to PSD synthetic minor emission limitations. The facility will maintain records of monthly coating usage and coating analysis for each line to show compliance with these requirements. A report detailing these records will be submitted quarterly.

Woodworking Operations with Baghouses

Wellborn Forest has many woodworking and sanding operations subject to opacity and particulate standards. The particulate control devices on the woodworking operations are connected in series

Applicable Regulations

These operations are subject to the visible emissions standards found in ADEM Admin. Code R. 335-3-4-.01 and to the process weight standards found in ADEM Admin. Code R. 335-3-4-.04.

Monitoring of Emissions

The baghouses will be monitored for visible emissions. Currently, weekly observations of visible emissions are done to maintain compliance with the particulate standards. If greater than normal emissions are noted, corrective action to minimize emissions will be taken within 24 hours. This will be followed by an additional observation to confirm that emissions are reduced to normal. Records of weekly observations and any corrective actions will be retained for at least five years and will be

available to be reviewed by Departmental personnel during compliance inspections.

CAM

Compliance Assurance Monitoring (CAM) is not applicable for the NESHAP (MACT) regulations within this Title V permit because these regulations were proposed post November 15, 1990 (Wood Furniture Manufacturing). CAM is not applicable for the Title V permit for the other units listed herein because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with a control device.

Fugitive Dust

The fugitive dust potential was evaluated and is not expected to be of concern at this facility. The plant property is grassed, and travel areas are covered by asphalt, concrete, or graveled surfaces. Wood waste particulate matter will pass through a baghouse before being emitted. No stockpiles of dust producing materials are planned. Therefore, it has been determined by the Department that a dust plan is not required at this time.

Permitting Fees

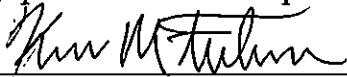
Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Standard practice is to notify of the issuance of this major source operating permit to all states bordering Alabama.

Recommendations

I recommend that the Major Source Operating Permit be renewed to Wellborn Forest pending resolution of any comments received during the 30-day public comment period and 45-day EPA review.



February 2025

Kevin Fulmer

Chemical Branch

KMF: kmf C:\KMF\COMP\TITLEV\KITHKITCHENS\RENEW2025\A930016B_5_00.doc