

Statement of Basis
Integrity Cabinets, LLC (Ashland)
304-0011

Introduction

Integrity Cabinets, LLC (Integrity) located in Ashland has applied for renewal of Major Source Operating Permit (MSOP) No. 304-0011. 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.

Air Permits for original construction of the site were issued on October 18, 2004, which covered Unit No. X001. A permitting action occurred on February 8, 2013, which added Unit No. X002. An Air Permit for changing the operation and an additional line was issued on January 10, 2014, which covered Unit No. X002. A permitting action occurred on December 16, 2014, which issued Air Permits that covered units X001, X002, and X010 in preparation of issuing a Title V Permit. These changes were incorporated into the Title V permit on March 7, 2016. An Air Permit was issued on March 7, 2022, which added Unit No. X004. An Air Permit for changing the operation and an additional line was issued on June 20, 2024, which covered Unit No. X002.

The initial Title V MSOP was issued on March 7, 2016, and this is the second renewal. The current MSOP expires on March 6, 2026. The renewal application was received on September 12, 2025.

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

There are no current or ongoing enforcement actions against Integrity 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 AL0000000102700011).

This facility conducts the manufacture and surface coating of wooden kitchen cabinets (SIC # 2434). The facility includes various assembly and painting 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 (HAPs). Integrity is a

synthetic minor source for Prevention of Significant Deterioration (PSD) purposes.

Since their last Title V issuance, no units have been removed from the plant. Air Permits for Unit Nos. X002 and X004 will be incorporated into the Title V with this issuance.

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

Permit Unit No.	Description of Unit
001	Surface Coating Operation
002	Off-Line Booth(s)
003	Woodworking Operations with Cyclone(s)/Baghouse(s)
004	Woodworking Operations with Cyclone(s)/Baghouse(s)

Coating Operations (001 and 002)

Following the woodworking operations, Integrity Cabinets has an automated overhead conveyor that feeds a stain booth, a small heat tunnel, followed by a primer booth, a small heat tunnel, a basecoat booth, a small heat tunnel, a topcoat booth, and finishing with a small heat tunnel. The heat tunnels are heated by infrared lamps powered by electricity. Most of the items are hung on the overhead conveyor with large pieces being coated on the floor line.

Integrity Cabinets also has two Offline-Booths which are used to coat large pieces or odd pieces that would slow down the main coating line.

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 Integrity to limit emissions of certain HAPs in their coatings and to implement certain work practices and training for operators.

The facility is subject to a Prevention of Significant Deterioration (PSD) synthetic minor emission limitation of 245 tons per year of VOC in any consecutive rolling 12-month period based on the premise that all VOCs

applied are emitted. This limit was established in Air Permit Nos. X001 and X002, and subsequently incorporated into the Title V issued on December 12, 2014.

Testing of Emissions

No periodic testing of emissions is required. Integrity uses manufacture's information based on Method 24 or 311 as appropriate for the coatings used in coating operations.

Recordkeeping and Reporting of Emissions

Integrity will maintain records of monthly coating usage and coating analysis for each line to show compliance with Subpart JJ requirements and the PSD limitation. These will be submitted quarterly.

Monthly reports summarizing these records will be submitted quarterly.

Woodworking Operations with Cyclones/Baghouses (003 and 004)

Integrity has many woodworking and sanding operations that are subject to opacity and particulate standards. The particulate control devices on the woodworking operations consist of Cyclone No. 1 and Baghouse No. 1.

Applicable Regulations

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

Monitoring of Emissions

The baghouse(s) and cyclone(s) 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.

Recordkeeping and Reporting of Emissions

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 renewal Major Source Operating Permit be issued to Integrity pending resolution of any comments received during the 30-day public comment period and 45-day EPA review.



October 2025

Kevin Fulmer

Chemical Branch

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