

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 1035-AOP-R0

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Mid-America Cabinets, Inc.
20980 Marion Lee Road
Gentry, Arkansas 72734

3. PERMIT WRITER:

Paul Osmon

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Kitchen Cabinet Manufacturer
SIC Code: 2434

5. SUBMITTALS: June 19, 2000

6. REVIEWER'S NOTES:

The permittee started as a small cabinet shop and has outgrown the minor source category. They are now subject to Subpart JJ since they have become a major source.

Permittee submitted calculations for SN-05 which show sawdust hauled (not calculated emissions). The particulate matter calculations from the minor source permit were re-used since they are based on full capacity and there has been no changes to the process.

7. COMPLIANCE STATUS: The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues

There current enforcement actions against this facility

8. APPLICABLE REGULATIONS:

A. Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera) (Y/N) N
 Has this facility underwent PSD review in the past (Y/N) N Permit # _____
 Is this facility categorized as a major source for PSD? (Y/N) N
 \$ 100 tpy and on the list of 28 (100 tpy)? (Y/N) N
 \$ 250 tpy all other (Y/N) N

B. PSD Netting

Was netting performed to avoid PSD review in this permit? (Y/N) N
 If so, indicate increases and decreases used in netting for PSD purposes only.

NETTING TABLE							
Emission Source	Pollutant Emission Rate (TPY)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Pb
Totals							
Significant Emission Rate	25	15	40	40	100	40	0.6
Subject to PSD?							

C. Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-01 through SN-04	VOC HAP	NESHAP 40 CFR 63, Subpart JJ

9. EMISSION CHANGES:

The following table summarizes plantwide emission changes associated with this permitting action.

Plantwide Permitted Emissions (ton/yr)			
Pollutant	Air Permit 1035-AR-2	Air Permit 1035-AOP-R0	Change
PM	17.6	17.6	0
PM ₁₀	17.6	17.6	0
VOC	74.7	148.4	73.7
TOTAL HAP	13.1	0	-13.1
Formaldehyde		0.13	0.13
Methanol		0.12	0.12
Cumene		0.05	0.05
Ethyl Benzene		3.32	3.32
Methyl Isobutyl Ketone		1.33	1.33
Toluene		9.99	9.99
Ethylene Glycol Monobutyl Ether		0.06	0.06
Xylene		14.80	14.8
Vinyl Acetate		0.01	0.01

10. MODELING:

A. Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

11. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The PAER was deemed by the Department to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m³)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Formaldehyde	1.5	0.165	0.16	Y
Methanol	262	28.82	0.12	Y
Cumene	246	27.06	0.07	Y
Ethyl Benzene	434	47.74	3.46	Y
Methyl Isobutyl Ketone	205	22.55	1.39	Y
Toluene	188	20.68	10.4	Y
Ethylene Glycol Monobutyl Ether	16	1.76	0.06	Y
Xylene	434	47.74	15.80	Y
Vinyl Acetate	35	3.85	0.07	Y

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
01 through 04	gun rates times paint content	-	None	NA	The lb/hr emission limits for each booth are based on gun rates times paint content limits
01 through 04	material balance for VOC and HAP	-	None	NA	tons per year emission rates are based on the material balance
05	AP-42	0.03gr/scf	cyclone	70%	Controlled

13. TESTING REQUIREMENTS:

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
No stack testing required.				

14. MONITORING OR CEMS

The following are parameters that must be monitored with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency*	Report (Y/N)**
No monitoring or CEMS				

* Indicate frequency of recording required for the parameter (Continuously, hourly, daily, etc.)
 ** Indicates whether the parameter needs to be included in reports.

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
01 through 04	VOC usage	148.4 tons/12months	monthly	Y
01 through 04	VOC content	7.5 lb/gal	-	-
01 through 04	HAP usage	see permit	monthly	Y
01 through 04	HAP content	see permit	-	-
01 through 04	Subpart JJ Compliance	1.0 lbs solid deposit/lb VHAP emitted of compliant materials usage	twice yearly	Y
01 through 04	Subpart JJ Compliance	various reports including work plans, operator training documentation, and usage of HAP in Table 5	as required	N

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

** Indicates whether the item needs to be included in reports

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
05	20%	Department Guidance	weekly observations

17. DELETED CONDITIONS:

The following Specific Conditions were included in the previous permit, but deleted for the current permitting action.

Former SC	Justification for removal
several	permit limits and compliance assurance provisions were completely revised for this permit.

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits for this facility which are voided/superseded/subsumed by issuance of this permit.

Permit #
1035-AR-2

19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

 Thomas Rheaume, P.E.