

## STATEMENT OF BASIS

*for the issuance of Draft Air Permit # 1035-AOP-R1*

**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 Manufacturing plant  
SIC Code: 2434

**5. SUBMITTALS:** May 25, 2001

**6. REVIEWER'S NOTES:**

The initial Title V permit issued to this facility omitted two sources (Adhesive Operations SN-06 and Washoff Operations SN-07). This permit modification is issued to add those two sources, change the compliance mechanism for meeting the HAP emission limits in the permit, and to extend the time allowed in the permit for compliance with 40 CFR 63 Subpart JJ to one year after becoming a major source (November 15, 2001).

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

The permittee is not subject to any enforcement actions at this time. The facility is probably not in compliance with the HAP limits in the previous permit and has not completed the transition period to full compliance with 60 CFR 63, Subpart JJ. The facility should be in full compliance with all Department Regulations when following the Specific Conditions in this permit on November 15, 2001 when compliance with the NESHAP is mandated.

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**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) \_\_\_\_\_

\$ 250 tpy all other (Y/N) \_\_\_\_\_

**B. Source and Pollutant Specific Regulatory Applicability**

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
Facility	HAP	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-AOP-R0	Air Permit 1035-AOP-R1	Change
PM/PM <sub>10</sub>	17.6	17.6	0
VOC	148.4	166.9	18.5
Individual Speciated HAPS	29.18		-29.18
Any Single HAP		33.5	33.5
Total HAP		55.1	55.1
Acetone		89.1	89.1

**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. The only criteria pollutant over 100 tpy is VOC at 166.9 tpy (below modeling levels).

**11. Non-Criteria Pollutants**

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLVs) which would pass the *PAER or PAIL*. Therefore, modeling of specific non-criteria pollutants was not performed.

The following TLV table is included in the permit. Acetone is evaluated separately because it is a named substance in the permit which is not a HAP but has a listed TLV.

Minimum HAP TLV* (mg/m <sup>3</sup> )	Maximum Individual HAP Content ( wt. %)
172.0	100
153.9	90
136.8	80
119.7	70
102.6	60
85.5	50
68.4	40
51.3	30
34.2	20
25.6	15
17.1	10
12.8	7.5
8.4	5.0
4.2	2.5

Minimum HAP TLV* (mg/m <sup>3</sup> )	Maximum Individual HAP Content ( wt. %)
1.7	1.0

**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/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

<b>Pollutant</b>	<b>TLV (mg/m<sup>3</sup>)</b>	<b>PAER (lb/hr) = 0.11*TLV</b>	<b>Proposed lb/hr</b>	<b>Pass?</b>
Acetone	1188	130.68	109.0	Y

**12. CALCULATIONS:**

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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	Material Balance	7.5 Lb/gal VOC 4.0 Lb/gal Acetone	None	NA	Spray Rate of 7.5 gallons/hr; tpy is actual usage
02	Material Balance	7.5 Lb/gal VOC 4.0 Lb/gal Acetone	None	NA	Spray Rate of 8.75 gallons/hr; tpy is actual usage
03	Material Balance	7.5 Lb/gal VOC 4.0 Lb/gal Acetone	None	NA	Spray Rate of 2.5 gallons/hr; tpy is actual usage
04	Material Balance	7.5 Lb/gal VOC 4.0 Lb/gal Acetone	None	NA	Spray Rate of 7.5 gallons/hr; tpy is actual usage
06	Material Balance	7.5 Lb/gal VOC 4.0 Lb/gal Acetone	None	NA	Spray Rate of 0.5 gallons/hr; tpy is actual usage
07	Material Balance	7.5 Lb/gal VOC 4.0 Lb/gal Acetone	None	NA	Spray Rate of 0.5 gallons/hr; tpy is actual usage
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 in this permit				

**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 in this permit				

\* 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 06 07	VOC usage	166.9 tons/12months	monthly	Y

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SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
01 through 04 06 07	VOC content	7.5 lb/gal	-	-
01 through 04 06 07	HAP usage	33.5 any single HAP 55.1 Total HAP	monthly	Y
01 through 04 06 07	HAP content	TLV Table see permit	-	-
01 through 04 06 07	Acetone Usage	89.1 tpy	-	-
01 through 04 06 07	Acetone Content	4.0 Lb/gal except for pure solvent used for gun cleaning	-	-
01 through 04 06 07	Subpart JJ Compliance	1.0 lbs solid deposit/lb VHAP emitted of compliant materials usage	twice yearly	Y

SN	Recorded Item	Limit (as established in permit)	Frequency *	Report (Y/N)**
01 through 04 06 07	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
Part 14	The compliance date for Subpart JJ has been changed from January 16, 2001 to November 15, 2001. Permittees are allowed one year to come into compliance with a Subpart after growing large enough to be subject to the Subpart. The previous permit only allowed 60 days.

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**



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

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1035-AOP-R0

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

\_\_\_\_\_  
*Thomas Rheaume, P.E.*