

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1035-AOP-R1

IS ISSUED TO:

Mid-America Cabinets, Inc.
20980 Marion Lee Road
Gentry, AR 72734
Benton County
CSN: 04-0247

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

November 16, 2000 and November 15, 2005

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE: Mid-America Cabinets, Inc.

CSN: 04-0247

PERMIT NUMBER: 1035-AOP-R1

FACILITY ADDRESS: 20980 Marion Lee Road
Gentry, AR 72734

COUNTY: Benton

CONTACT POSITION: Secretary/Treasurer - Robert Sample

TELEPHONE NUMBER: (501)736-2671

FAX NUMBER: (501)736-8086

REVIEWING ENGINEER: Paul Osmon

UTM North-South (Y): 4012.1 km N

UTM East-West (Y): 365.4 km E

Zone 15

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SECTION II: INTRODUCTION

Summary of Permit Activity

Mid-America Cabinets, located at 20980 Marion Lee Road, Gentry, Arkansas, manufactures kitchen cabinets. This manufacturing process includes woodworking, staining, and varnishing. 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).

Process Description

Summary

Mid-America Cabinets, located in Gentry (Benton County) manufactures wooden kitchen cabinetry. The manufacturing processes carried out by Mid-America includes various woodworking activities, used to shape the wood prior to finishing, a finishing operation in which various stains and varnishes are applied to the wood pieces, an adhesives operation which mates the wood to itself and occasionally to synthetic laminates, and finally an assembly operation.

Milling Operations (SN-05)

The raw wood stock received by Mid-America is shaped into the wood cabinet pieces through a milling process prior to finishing and assembly of the cabinets. This process is accomplished using several wood working machines, each equipped with its own sawdust collection pipe. The individual sawdust collection pipes are connected to a primary duct, which carries the sawdust to a cyclone particle separator located immediately outside the plant. The system is driven by a fifty horsepower (50 HP) blower motor manufactured by the New York Blower Company, with a capacity of 15,500 cubic feet per minute (cfm) as configured. The sawdust particles extracted from the system are deposited into a hopper located directly below the cyclone for off-site transportation.

Adhesive Operation (SN-06)

Following the milling operations, the wood components are transferred to the assembly department where some of the wood pieces are joined to each other and laminated with synthetic surfaces materials, using contact adhesives. These adhesives are applied using spray equipment, with the emissions associated with Adhesives Operations characterized as SN-06, and are

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defined as non-stack VOCs and HAPs.

Washoff Operations (SN-07)

During the application of adhesives used at SN-06, or when already bonded cabinet pieces arrive with excess adhesives on them, it becomes necessary to clean the bonded pieces using organic based solvents. These solvents are manually wiped on using cloth rags, which are then stored in normally closed containers until either laundered or disposed of. The rate at which the VOCs and HAPs become airborne at SN-07 is limited due to the lack of any pressurized spray equipment in the application process.

Finishing Operations (SN-01 through SN-04)

Upon reaching the Finishing Operations area, the pieces are carried through Spray Booth A (SN-01) where stain is applied using manually operated, hand-held spray equipment. Following the application of the stain, the pieces are carried via the overhead conveyor on to Spray Booth B (SN-02) where sanding sealers are applied also using manually operated hand-held spray equipment. Next, the wood cabinet pieces are transported to either of two spray booths, each used to apply a type of varnish. Spray Booth C (SN-03) is used less frequently than Spray Booth (SN-04), due to the lower production demand for pre-catalyzed varnish, which Spray Booth C is configured to apply. Spray Booth D (SN-04) receives the majority of the cabinet pieces and is used to apply a catalyzed varnish using manually operated hand-held spray equipment. Following the completion of the cabinet pieces through Finishing Operations, the pieces are allowed to air-dry prior to assembly.

Regulations

The facility is subject to regulation under the *Clean Air Act* as amended, the *Arkansas Water and Air Pollution Control Act*, the *Arkansas Air Pollution Control Code* (Regulation 18), *Regulation of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations for the Arkansas Operating Air Permit Program* (Regulation 26). The facility is a wood furniture manufacturer subject to 40 CFR Part 63 - Subpart JJ - *National Emission Standards for Wood Furniture Manufacturing Operations*.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	4.0	17.6	
		PM ₁₀	4.0	17.6	
		VOC	204.5	166.9	
HAPs*		any single HAP*	204.5	33.5	
		total HAP*	204.5	55.1	
Air Contaminants **		Acetone **	109.0	89.1	
SN-01	Spray Booth A	VOC	56.3	-	11
		Individual HAP	56.3		
		Total HAP	56.3		
		Acetone	31.0		
SN-02	Spray Booth B	VOC	65.7	-	11
		Individual HAP	65.7		
		Total HAP	65.7		
		Acetone	36.0		
SN-03	Spray Booth C	VOC	18.8	-	11
		Individual HAP	18.8		
		Total HAP	18.8		
		Acetone	11.0		
SN-04	Spray Booth D	VOC	56.3	-	11
		Individual HAP	56.3		
		Total HAP	56.3		
		Acetone	31.0		
SN-01 through SN-04 SN-06 SN-07	Facility Wide VOC, HAP and Air Contaminant Limits	VOC		166.9	
		Individual HAP		33.5	
		Total HAP		55.1	
		Acetone		89.1	
SN-05	Woodworking Cyclone	PM	4.0	17.6	9
		PM ₁₀	4.0	17.6	

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EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
SN-06	Spray Booth F - Adhesives	VOC	3.8		11
		Individual HAP	3.8	-	
		Total HAP	3.8		
SN-07	Washoff Operations	VOC	3.8		11
		Individual HAP	3.8	-	
		Total HAP	3.8		

- * HAPs included in the VOC totals are indicated by an *. Other HAPs are not included in any other totals unless specifically stated.
- ** Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not classified as VOC or HAPs.

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SECTION III: PERMIT HISTORY

Permit 1035-A was issued to Mid America Cabinets, Inc. on March 31, 1990. The permit listed six sources consisting of 4 paint booths, a drying booth and a wood working cyclone. Permit emission limits were: Particulate - 5.2 tpy, NO_x - 0.62 tpy and VOC - 70.1 tpy.

Permit 1035-AR-1 was issued to Mid America Cabinets, Inc. on August 4, 1998. Total sources listed were five. HAPs limits were established for the first time in this permit. Permit emission limits were: PM/PM₁₀ - 5.0 tpy, VOC - 54.4 tpy, Toluene - 9.1 tpy, Methanol - 1.4 tpy, Ethyl Benzene - 0.9 tpy, Xylene - 5.3 tpy, Methyl Ethyl Ketone - 1.7 tpy and Methyl Isobutyl Ketone - 0.3 tpy.

Permit No. 1053-AR-2 was issued to Mid America Cabinets, Inc. on July 26, 1999. Total sources listed were five. Permit emission limits were: PM/PM₁₀ - 17.6 tpy, VOC - 74.7 tpy and total HAPs - 13.1 tpy.

Permit No. 1035-AOP-R0 was issued to Mid-America Cabinets, Inc. on November 16, 2000. Total sources listed were five. Permit emission limits were: PM/PM₁₀ - 17.6 tpy, VOC - 148.4 tpy Formaldehyde - 0.13 tpy, methanol - 0.12 tpy, Cumene - 0.05 tpy, ethyl benzene - 3.32 tpy, methyl isobutyl ketone - 1.33 tpy, toluene - 9.99 tpy, ethylene glycol monobutyl ether - 0.01 tpy, xylene - 14.22 tpy, and vinyl acetate - 0.01 tpy.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-05
Woodworking Cyclone

Source Description

The raw wood stock received by Mid-America is shaped into the wood cabinet pieces through a milling process prior to finishing and assembly of the cabinets. This process is accomplished using several wood working machines, each equipped with its own sawdust collection pipe. The individual sawdust collection pipes are connected to a primary duct, which carries the sawdust to a cyclone particle separator (SN-05) located immediately outside the plant. The system is driven by a fifty horsepower (50 HP) blower motor manufactured by the New York Blower Company, with a capacity of 15,500 cubic feet per minute (cfm) as configured. The sawdust particles extracted from the system are deposited into a hopper located directly below the cyclone for off-site transportation.

Specific Conditions

1. Pursuant to §19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective February 15, 1999 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. The lb/hr and tpy emissions limits are based on the maximum capacity associated with these sources.

SN	Description	Pollutant	lb/hr	tpy
05	Woodworking Cyclone	PM ₁₀	4.0	17.6

2. Pursuant to §18.1004 of Arkansas Air Pollution Control Code (Regulation #18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The lb/hr and tpy emissions limits are based on the maximum capacity associated with these sources.

SN	Description	Pollutant	lb/hr	tpy
05	Woodworking Cyclone	PM	4.0	17.6

3. Pursuant to §18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause to be discharged to the atmosphere from SN-05 gases which exhibit an opacity greater than 20%.

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4. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, Section 19.705 of Regulation #19 and 40 CFR Part 52 Subpart E, weekly observations of the opacity from SN-05 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of the permitted level are observed, the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from this source. If the opacity observed does not appear to be in excess of the permitted level, then no further action is needed, and the permittee will be considered in compliance with the permitted opacity limit. If visible emissions which appear to be in excess of the permitted level are still observed, a 6-minute visible emissions reading shall be conducted by a person certified in EPA Reference Method 9 to determine if the opacity is less than the permitted level. If the opacity observed is not in excess of the permitted level, then no further action is needed, and the permittee will be considered in compliance with the permitted opacity limit and 19.705 of Regulation #19. If no Method 9 reading is conducted despite emissions appearing to be in excess of the permitted level after corrective action has been taken, the permittee shall be considered out of compliance with the permitted opacity limit and 19.705 of Regulation #19 for that day. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, kept on site, and made available to Department personnel upon request.
 - a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.

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SN-01, 02, 03, 04, 06, and 07
Coatings Operations, Adhesive Operations & Washoff Operations

Source Description

Following the milling operations, the wood components are transferred to the assembly department where some of the wood pieces are joined to each other and laminated with synthetic surfaces materials, using contact adhesives. These adhesives are applied using spray equipment, with the emissions associated with Adhesives Operations characterized as SN-06, and are defined as non-stack VOCs and HAPs.

During the application of adhesives used at SN-06, or when already bonded cabinet pieces arrive with excess adhesives on them, it becomes necessary to clean the bonded pieces using organic based solvents. These solvents are manually wiped on using cloth rags, which are then stored in normally closed containers until either laundered or disposed of. The rate at which the VOCs and HAPs become airborne at SN-07 is limited due to the lack of any pressurized spray equipment in the application process.

Upon reaching the Finishing Operations area, the pieces are carried through Spray Booth A (SN-01) where stain is applied using manually operated, hand-held spray equipment. Following the application of the stain, the pieces are carried via the overhead conveyor on to Spray Booth B (SN-02) where sanding sealers are applied also using manually operated hand-held spray equipment. Next, the wood cabinet pieces are transported to either of two spray booths, each used to apply a type of varnish. Spray Booth C (SN-03) is used less frequently than Spray Booth (SN-04), due to the lower production demand for pre-catalyzed varnish, which Spray Booth C is configured to apply. Spray Booth D (SN-04) receives the majority of the cabinet pieces and is used to apply a catalyzed varnish using manually operated hand-held spray equipment. Following the completion of the cabinet pieces through Finishing Operations, the pieces are allowed to air-dry prior to assembly. Each paint booth will be permitted for maximum capacity of the spray gun times the content of paint used. Compliance will be shown by record keeping of the content of paints used (for lb/hr limits) and by material balance (for tpy limits).

Specific Conditions

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5. Pursuant to §19.501 of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with the lb/hr limits shall be shown by compliance with Specific Condition No. 6. Compliance with the ton per year limits will be shown by compliance with Specific Condition No. 7.

SN	Description	Pollutant	lb/hr	tpy
01	Spray Booth A	VOC	56.3	166.9
02	Spray Booth B		65.7	
03	Spray Booth C		18.8	
04	Spray Booth D		56.3	
06	Adhesives Operations		3.8	
07	Washoff Operations		3.8	

6. Pursuant to §19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and, 40 CFR 70.6, the permittee shall use compounds having volatile organic compounds below the following limits:

SN	Description	Maximum VOC Content (lb/gal)
01	Spray Booth A	7.5
02	Spray Booth B	
03	Spray Booth C	
04	Spray Booth D	
06	Adhesives Operations	
07	Washoff Operations	

7. Pursuant to §19.705 of Regulation #19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which demonstrate compliance with the ton per year limit in Specific Condition No. 5 and the formulations in Specific Condition No. 6. Records shall consist of MSDS sheets for each compound used and a material balance for VOC usage with a total of less than 166.9 tons per rolling 12-month period for all booths. Records shall be updated by the fifteenth day of the month following the month for which the records pertain. These records shall be kept on site, provided to Department personnel

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upon request and may be used by the Department for enforcement purposes. A twelve month rolling average and each month's individual data shall be submitted to the Department in accordance with General Provision #7.

8. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be shown by Specific Condition No. 9 for the ton per year limits and Specific Condition No. 6 and Specific Condition No. 11 for the pound per hour limits.

SN	Description	Pollutant	lb/hr	tpy
Facility	Plantwide HAPs Limits	Any single HAP Total HAP Acetone	-	33.5 55.1 89.1
01	Spray Booth A	Total HAP Acetone	56.3 29.5	-
02	Spray Booth B	Total HAP Acetone	65.7 34.4	-
03	Spray Booth C	Total HAP Acetone	18.8 9.9	-
04	Spray Booth D	Total HAP Acetone	56.3 29.5	-
06	Adhesives Operations	Total HAP Acetone	3.8 2.0	
07	Washoff Operations	Total HAP Acetone	3.8 2.0	

9. Pursuant to §18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records consisting of a material balance of HAPS and acetone usage per rolling 12 month period which demonstrate compliance with the tons per year limits in Specific Condition No.8 by demonstrating that no single HAP usage exceeds 33.5 tons per rolling 12 month period, that total HAP usage does not exceed 55.1 tons per rolling 12 month period, and that total acetone usage does not exceed 89.1 tons per rolling 12 month period. Records shall be updated by the fifteenth day of the month following the month for which the records pertain. These records shall be kept on site, provided to Department personnel upon request and may be used by the Department for enforcement purposes. A twelve month rolling average and each month's

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individual data shall be submitted to the Department in accordance with General Provision #7.

10. Pursuant to §18.1004 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use compounds which exceed the content limits outlined in weight percent in the following table. The table can be linearly interpolated.

Minimum HAP TLV* (mg/m ³)	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
1.7	1.0

11. Pursuant to §18.1004 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not use compounds which exceed 4.0 lbs/gal acetone content except for the pure acetone solvent used for paint gun cleaning.
12. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall use only compliant contact adhesives as defined in 40 CFR 63, §63.801 at this facility. See Specific Condition No. 23 for the requirements to be compliant with Subpart JJ.

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13. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall use only compliant strippable spray booth coating as defined in 40 CFR63, §63.802(a)(3) at this facility. See Specific Condition No. 23 for the requirements to be compliant with Subpart JJ.
14. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall comply with all applicable sections of the National Emission Standards for Wood Furniture Manufacturing Operations after the compliance date of November 15, 2001. This document has been attached as Appendix A for reference.
15. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall comply with the requirements of subpart A shown in Appendix A, according to the applicability of Subpart A, as identified in Table 1 of Subpart JJ. Table 1 can be found on page 17 and 18 of Appendix A.
16. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) thru (l) of §63.803. The plan shall be developed no later than 60 days after the issuance of the final Regulation 26 permit. This plan shall be available for inspection by Department personal upon request. The Department reserves the right to require the permittee modify the plan if it does not adequately address each of the topics listed in paragraphs (b) thru (l) of §63.803.
17. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall submit the compliance status report required by § 63.9 (h) of Subpart A no later than 60 days after the compliance date. This report shall include the information required in Specific Conditions No. 30, 34 or 38, depending upon which method of compliance is chosen.
18. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - (i) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
 - (ii) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
 - (iii) The semiannual reports shall include the information contained in Specific Conditions No. 31, 35 or 39, depending upon which method of compliance is chosen. A statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

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19. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall submit a compliance certification with the semiannual report required in Specific Condition No. 18.
 - (i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

20. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee is required to provide a written notification under § 63.803 (l)(4) if the annual usage of certain VHAP exceeds its baseline usage level. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in Table 5 of Subpart JJ. This notification shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

21. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain records of the following:
 - (i) A certified product data sheet for each finishing material and thinner subject to the emission limits in § 63.802; and
 - (ii) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material subject to the emission limits in § 63.802.

22. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - (i) Records demonstrating that the operator training program required § 63.803 (b) is in place;
 - (ii) Records collected in accordance with the inspection and maintenance plan required by § 63.803 (c);
 - (iii) Records associated with the cleaning solvent accounting system required by § 63.803(d);
 - (iv) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by § 63.803 (h)(5).
 - (v) Records associated with the formulation assessment plan required by § 63.803 (l);

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- and
- (vi) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
23. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources shown in the following table.

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Emission Point	Existing Source	New Source
Finishing Operations:		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied.	^a 1.0	^a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):		
-stains	^a 1.0	^a 1.0
-washcoats	^{a,b} 1.0	^{a,b} 0.8
-sealers	^a 1.0	^a 0.8
-topcoats	^a 1.0	^a 0.8
-basecoats	^{a,b} 1.0	^{a,b} 0.8
-enamels	^{a,b} 1.0	^{a,b} 0.8
-thinners (maximum % HAP allowable); or	10.0	10.0
(c) As an alternative, use control device; or	^c 1.0	^c 0.8
(d) Use any combination of (a), (b), and (c).	1.0	0.8
Cleaning Operations:		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids]).	0.8	0.8
Contact Adhesives:		
(a) Use complaint contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates.	^d NA	^d NA
ii. For foam adhesives used in products that meet flammability requirements.	1.8	0.2
iii. For all other contact adhesives (including foam adhesives used in	1.0	0.2
products that do not meet flammability requirements); or	^e 1.0	^e 0.2
(b) Use a control device		

^a The limits refer to the VHAP content of the coating, as applied.

^b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.

^c The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^d There is no limit on the VHAP content of these adhesives.

^e The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

24. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall conduct all performance tests in accordance with §63.805.
25. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain records of the compliance certifications submitted in accordance with Specific Condition No. 19 for

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each semiannual period following the compliance date.

26. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain records of all other information submitted with the compliance status report required in Specific Condition No. 17 and the semiannual reports required in Specific Condition No. 18.
27. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain all records in accordance with the requirements of § 63.10 (b)(1).
28. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall show compliance with Specific Condition No. 23 by any method presented in §63.804 (a)(1) thru (a)(4). Method I shown in (a)(1) can be found in Specific Conditions No. 29 thru 32; Method II shown in (a)(2) can be found in Specific Conditions No. 33 thru 36; Method III shown in (a)(3) can be found in Specific Conditions No. 37 thru 42; and Method IV shown in (a)(4) can be found in Specific Condition No. 43.

Method I

29. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall calculate the average VHAP content for all finishing materials used at the facility by the following equation and maintain a value of E no greater than 1.0;

$$E = (M_{c1} + M_{c2}C_{c2} + * * * + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + * * * S_nW_n)/(M_{c1} + * * * + M_{cn})$$

Nomenclature used throughout this permit can be found on pages 5 and 6 of Appendix A.

30. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall demonstrate initial compliance by submitting the results of the averaging calculation from Specific Condition No. 29 for the first month with the initial compliance status report set out in Specific Condition No. 17. The first month's calculation shall include data for the entire month in which the compliance date falls.
31. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall demonstrate continuous compliance by submitting the results of the averaging calculation from Specific Condition No. 29 for each month within that semiannual period and submitting a compliance certification with the semiannual report shown in Specific Condition No. 18.
 - (i) The compliance certification shall state that the value of (E), as calculated in Specific Condition No. 29, is no greater than 1.0 . An affected source is in

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violation of the standard if E is greater than 1.0. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

32. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Specific Condition No. 29.

Method II

33. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall use compliant finishing materials according to the following criteria:
- (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.
34. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall demonstrate initial compliance by:
- (i) Submitting the initial compliance status report set out in Specific Condition No. 17 stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or
 - (ii) Submitting the initial compliance status report set out in Specific Condition No. 17 stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The

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permittee shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

35. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall demonstrate continuous compliance by following the procedures in paragraph (i) or (ii).
- (i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report shown in Specific Condition No. 18.
 - (A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - (ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report shown in Specific Condition No. 18.
 - (A) The compliance certification shall state that compliant coating, as determined by the VHAP content of the coating in the reservoir, has been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.
 - (B) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in § 63.804 (a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
36. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain the records required in Specific Condition No. 21 as well as records of the following:
- (i) Solvent and coating additions to the continuous coater reservoir;
 - (ii) Viscosity measurements; and
 - (iii) Data demonstrating that viscosity is an appropriate parameter for demonstrating

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compliance.

Method III

37. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall use a control system with an overall control efficiency (R) such that the value of E_{ac} is no greater than 1.0.

$$R = [(E_{bc} * E_{ac})/E_{bc}](100)$$

E_{bc} will be the same as E in Specific Condition No. 29.

38. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall demonstrate initial compliance by the procedures that follow:
- (i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;
 - (ii) Conducting an initial performance test as required under § 63.7 using the procedures and test methods listed in § 63.7 and § 63.805 (c) and (d) or (e);
 - (iii) Calculating the overall control efficiency (R) following the procedures in § 63.805 (d) or (e); and
 - (iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.
 - (A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.
 - (B) For compliance with a catalytic incinerator equipped with a fixed catalytic bed, the minimum gas temperature both upstream and downstream of the catalyst bed shall be the operating parameter.
 - (C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameters.
 - (D) For compliance with a carbon adsorber, the operating parameters shall be the total regeneration mass stream flow for each regeneration cycle and the carbon bed temperature after each regeneration, or the concentration level of organic compounds exiting the adsorber, unless the owner or operator requests and receives approval from the Administrator to establish other operating parameters.
 - (E) For compliance with a control device not listed in this section, one or more operating parameter values shall be established using the procedures

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identified in Specific Condition No. 39 (iv).

- (v) Owners or operators complying with this condition shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating parameter values, as appropriate, that demonstrate compliance with the standards, during the three test runs required by § 63.805 (c)(1).
39. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to manufacturer's specifications. The owner or operator shall also submit the excess emissions and continuous monitoring system performance report and summary report required in Specific Condition No. 42 and § 63.10 (e) of Subpart A.
- (i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with § 63.804 (f)(6)(i) is required.
 - (ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.
 - (A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox in a position before any substantial heat exchange occurs.
 - (B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.
 - (C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to determine the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.
 - (iii) Where a carbon adsorber is used one of the following is required:
 - (A) An integrating stream flow monitoring device having an accuracy of ± 10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device. Having an accuracy of ± 1 percent of the temperature being monitored or ± 0.5 EC, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;
 - (B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or
 - (C) Any other monitoring device that has been approved by the Administrator

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in accordance with Specific Condition No. 38 (iv)(D).

- (iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.
 - (v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.
 - (vi) An owner or operator who uses a control device not listed in Specific Condition No. 38 shall submit, for the Administrator's approval, a description of the device, test data verifying performance, and appropriate site-specific operating parameters that will be monitored to demonstrate continuous compliance with the standard.
40. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall determine the overall control efficiency of the control system (R) as the product of the capture and control device efficiency, using the test methods cited in § 63.805 (c) and the procedures in § 63.805 (d) or (e).
41. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the value of E_{ac} required by Specific Condition No. 37, records of the operating parameter values, and copies of the semiannual compliance reports required in Specific Condition No. 42.
42. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.10 (e) of Subpart A. The report shall include the monitored operating parameter values required in Specific Condition No. 35. If the source experiences excess emissions, the report shall be submitted quarterly for at least 1 year after the excess emissions occur and until a request to reduce reporting frequency is approved, as indicated in § 63.10 (e)(3)(C). If no excess emissions occur, the report shall be submitted semiannually.

Method IV

43. Pursuant to 40 CFR Part 63, Subpart JJ, the permittee shall use any combination of an averaging approach, as described in Specific Condition No. 29, compliant finishing materials, as described in Specific Condition No. 33, and a control system, as described in Specific Condition No. 37.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Mid-America Cabinets, Inc. is in compliance with the applicable regulations cited in the permit application except for 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations. The compliance schedule for 40 CFR 63, Subpart JJ is that full compliance will be obtained by November 15, 2001. Mid-America Cabinets, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

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SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

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6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Title VI Provisions

7. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
8. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
9. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II

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substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

10. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

11. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated April 24, 2000.

Description	Category
None Listed	

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;

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- d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,
 - e. The duration of the deviation,
 - f. The average emissions during the deviation,

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- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

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19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:

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- a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A
NESHAP 40 CFR 63, SUBPART JJ