

ADEQ OPERATING AIR PERMIT

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

Permit No. : 1035-AOP-R2

Renewal #1

IS ISSUED TO:

Mid-America Cabinets, Inc.
20980 Marion Lee Road
Gentry, AR 72734
Benton County
AFIN: 04-00247

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:

AND

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

Table of Contents

SECTION I: FACILITY INFORMATION	4
SECTION II: INTRODUCTION	5
Summary of Permit Activity	5
Process Description	5
Regulations	6
Emission Summary	7
SECTION III: PERMIT HISTORY	9
SECTION IV: SPECIFIC CONDITIONS	10
SECTION V: COMPLIANCE PLAN AND SCHEDULE	26
SECTION VI: PLANTWIDE CONDITIONS	27
SECTION VII: INSIGNIFICANT ACTIVITIES	28
SECTION VIII: GENERAL PROVISIONS	29
Appendix A – 40 CFR 63 – Subpart JJ.....	34

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

SECTION I: FACILITY INFORMATION

PERMITTEE: Mid-America Cabinets, Inc.

AFIN: 04-00247

PERMIT NUMBER: 1035-AOP-R2

FACILITY ADDRESS: 20980 Marion Lee Road
Gentry, AR 72734

MAILING ADDRESS: P.O. Box 219
Gentry, AR 72737

COUNTY: Benton

CONTACT POSITION: Secretary/Treasurer – Robert Sample

TELEPHONE NUMBER: (479)736-2671

FAX NUMBER: (479)736-8086

REVIEWING ENGINEER: Paul Osmon

UTM North South (Y): Zone 15: 4012.2 km N

UTM East West (X): Zone 15: 365.4 km E

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

SECTION II: INTRODUCTION

Summary of Permit Activity

Mid-America Cabinets, located at 20980 Marion Lee Road, Gentry, Arkansas, manufactures wooden kitchen cabinetry. This permit modification is issued to renew the initial Title V permit for this facility. The only process change from the previous permit is the inclusion of a laminator in the insignificant activities list.

Process Description

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, and 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 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

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

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 D (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 following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
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. This table, in itself, is not an enforceable condition of the permit.

Mid-America Cabinets, Inc.
 Permit No. 1035-AOP-R2
 AFIN: 04-00247

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			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	Description	Pollutant	lb/hr	tpy
SN-01	Spray Booth A	VOC	56.3	-
		Individual HAP	56.3	
		Total HAP	56.3	
		Acetone	31.0	
SN-02	Spray Booth B	VOC	65.7	-
		Individual HAP	65.7	
		Total HAP	65.7	
		Acetone	36.0	
SN-03	Spray Booth C	VOC	18.8	-
		Individual HAP	18.8	
		Total HAP	18.8	
		Acetone	11.0	
SN-04	Spray Booth D	VOC	56.3	-
		Individual HAP	56.3	
		Total HAP	56.3	
		Acetone	31.0	

Mid-America Cabinets, Inc.
 Permit No. 1035-AOP-R2
 AFIN: 04-00247

SN-01 through SN-04 SN-06 SN-07	Facility Wide VOC, HAP and Air Contaminant Limits	VOC Individual HAP Total HAP Acetone		166.9 33.5 55.1 89.1
SN-05	Woodworking Cyclone	PM PM ₁₀	4.0 4.0	17.6 17.6
SN-06	Spray Booth F - Adhesives	VOC Individual HAP Total HAP Acetone	3.8 3.8 3.8 2.0	-
SN-07	Washoff Operations	VOC Individual HAP Total HAP Acetone	3.8 3.8 3.8 2.0	-

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

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.

Permit No. 1035-AOP-R1 was issued to Mid-America Cabinets, Inc. on October 22, 2001. Total sources listed were seven. Permit emission limits were: PM/PM₁₀ - 17.6 tpy, VOC - 166.9 tpy Total HAPS - 55.1 tpy, any single HAP - 33.5 tpy, and acetone - 89.1 tpy.

SECTION IV: SPECIFIC CONDITIONS

**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 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. 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. [§19.501 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective December 19, 2004 (Regulation 19) and 40 CFR Part 52, Subpart E]

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

2. 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. [§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]

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

3. The permittee shall not cause to be discharged to the atmosphere from SN-05 gases

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

which exhibit an opacity greater than 20%. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. 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. [§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]
 - 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.

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

**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 D (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

5. 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. [§19.501 of Regulation #19 and 40 CFR Part 52, Subpart E]

Mid-America Cabinets, Inc.
 Permit No. 1035-AOP-R2
 AFIN: 04-00247

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. The permittee shall use compounds having volatile organic compounds below the following limits: [§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]

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. 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 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. [§19.705 of Regulation #19 and

Mid-America Cabinets, Inc.
 Permit No. 1035-AOP-R2
 AFIN: 04-00247

40 CFR Part 52, Subpart E]

8. 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. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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. 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 individual data shall be submitted to the Department in accordance with General Provision #7. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

10. 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. [§18.1004 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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. 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. [§18.1004 of Regulation #18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

40CFR Part 63 – Subpart JJ Compliance

12. 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

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

compliant with Subpart JJ. [40 CFR Part 63, Subpart JJ]

13. 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. [40 CFR Part 63, Subpart JJ]
14. 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. [40 CFR Part 63, Subpart JJ]
15. 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. [40 CFR Part 63, Subpart JJ]
16. 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. [40 CFR Part 63, Subpart JJ]
17. 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. [40 CFR Part 63, Subpart JJ]
18. The permittee shall submit a report covering the previous 6 months of wood furniture manufacturing operations: [40 CFR Part 63, Subpart JJ]
 - (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.

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

19. The permittee shall submit a compliance certification with the semiannual report required in Specific Condition No. 18. [40 CFR Part 63, Subpart JJ]
 - (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. 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 explain 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. [40 CFR Part 63, Subpart JJ]

21. The permittee shall maintain records of the following: [40 CFR Part 63, Subpart JJ]
 - (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. 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: [40 CFR Part 63, Subpart JJ]
 - (i) Records demonstrating that the operator training program required § 63.803 (b) is in place;

Mid-America Cabinets, Inc.
 Permit No. 1035-AOP-R2
 AFIN: 04-00247

- (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); and
- (vi) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

23. The permittee shall limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources shown in the following table. [40 CFR Part 63, Subpart JJ]

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		
-washcoats	^a 1.0	^a 1.0
-sealers	^{a,b} 1.0	^{a,b} 0.8
-topcoats	^a 1.0	^a 0.8
-basecoats	^a 1.0	^a 0.8
-enamels	^{a,b} 1.0	^{a,b} 0.8
-thinners (maximum % HAP allowable); or	^{a,b} 1.0	^{a,b} 0.8
(c) As an alternative, use control device; or	10.0	10.0
(d) Use any combination of (a), (b), and (c).	^c 1.0	^c 0.8
Cleaning Operations:	1.0	0.8
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids]).		
Contact Adhesives:	0.8	0.8
(a) Use compliant 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.		
ii. For foam adhesives used in products that meet flammability	^d NA	^d NA

Mid-America Cabinets, Inc.
 Permit No. 1035-AOP-R2
 AFIN: 04-00247

requirements.		
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	1.8	0.2
(b) Use a control device	1.0	0.2
	^e 1.0	^e 0.2

^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. The permittee shall conduct all performance tests in accordance with §63.805. [40 CFR Part 63, Subpart JJ]
25. The permittee shall maintain records of the compliance certifications submitted in accordance with Specific Condition No. 19 for each semiannual period following the compliance date. [40 CFR Part 63, Subpart JJ]
26. 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. [40 CFR Part 63, Subpart JJ]
27. The permittee shall maintain all records in accordance with the requirements of § 63.10 (b)(1). [40 CFR Part 63, Subpart JJ]
28. 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. [40 CFR Part 63, Subpart JJ]

Method I

29. 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: [40 CFR Part 63, Subpart JJ]

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

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

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

30. 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. [40 CFR Part 63, Subpart JJ]
31. 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. [40 CFR Part 63, Subpart JJ]
 - (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 violation of the standard if E is greater then 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. 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. [40 CFR Part 63, Subpart JJ]

Method II

33. The permittee shall use compliant finishing materials according to the following criteria: [40 CFR Part 63, Subpart JJ]
 - (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,

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

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. The permittee shall demonstrate initial compliance by: [40 CFR Part 63, Subpart JJ]

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

35. The permittee shall demonstrate continuous compliance by following the procedures in paragraph (i) or (ii). [40 CFR Part 63, Subpart JJ]

- (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

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

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. The permittee shall maintain the records required in Specific Condition No. 21 as well as records of the following: [40 CFR Part 63, Subpart JJ]
- (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 compliance.

Method III

37. 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. [40 CFR Part 63, Subpart JJ]

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

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

38. The permittee shall demonstrate initial compliance by the procedures that follow: [40 CFR Part 63, Subpart JJ]
- (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 identified in Specific Condition No. 39 (iv).
 - 5) 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. 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. [40 CFR Part 63, Subpart JJ]
- (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.
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 °C, 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 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. 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). [40 CFR Part 63, Subpart JJ]
41. The permittee shall maintain copies of the calculations demonstrating that the overall

Mid-America Cabinets, Inc.
Permit No. 1035-AOP-R2
AFIN: 04-00247

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. [40 CFR Part 63, Subpart JJ]

42. 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. [40 CFR Part 63, Subpart JJ]

Method IV

43. 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. [40 CFR Part 63, Subpart JJ]

Mid-America Cabinets, Inc.
Permit #: 1035-AOP-R2
AFIN: 04-00247

SECTION V: COMPLIANCE PLAN AND SCHEDULE

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.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's location and retain all previous versions of the SSM plan for five years. [Regulation 19, §19.304 and 40 CFR 63.6(e)(3)]

Mid-America Cabinets, Inc.

Permit #: 1035-AOP-R2

AFIN: 04-00247

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 13, 2005.

Description	Category
Laminating Operations	Group A, No. 13

SECTION VIII: GENERAL PROVISIONS

1. 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. [40 CFR 70.6(b)(2)]
2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation 26, §26.406]
4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - 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. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample,

Mid-America Cabinets, Inc.
Permit #: 1035-AOP-R2
AFIN: 04-00247

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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

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

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report 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:
 - i. The facility name and location
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The

Mid-America Cabinets, Inc.
Permit #: 1035-AOP-R2
AFIN: 04-00247

permittee 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 the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]
14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director

Mid-America Cabinets, Inc.
Permit #: 1035-AOP-R2
AFIN: 04-00247

- along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
 17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
 19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
 20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - 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 required 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 assuring compliance with this permit or applicable requirements.
 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also

Mid-America Cabinets, Inc.
Permit #: 1035-AOP-R2
AFIN: 04-00247

submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

- 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;
 - e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.
22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
- 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. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

APPENDIX A

40 CFR 63, Subpart JJ