

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1035-AOP-R7 AFIN: 04-00247

1. PERMITTING AUTHORITY:

Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

MAC Holdings, Inc.
20980 Marion Lee Road
Gentry, Arkansas 72734

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Wood Kitchen Cabinet and Countertop Manufacturing
NAICS Code: 337110

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
7/20/2020	Renewal	None

6. REVIEWER'S NOTES:

Mid-America Cabinets, located at 20980 Marion Lee Road, Gentry, Arkansas, manufactures wooden kitchen cabinetry. The permittee has submitted a renewal application for their Title V permit. Nineteen Natural Gas HVAC Overhead Heaters have been added as A-1 Insignificant Activities. There are no changes to permitted emission rates.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on April 27, 2020. There were no noted areas of concern.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	HAP	40 C.F.R. 63, Subpart JJ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

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

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y

If exempt, explain: No H₂S present.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	Material Balance	7.6 lb/gal VOC 3.5 lb/gal Acetone	None	N/A	Spray rate of 7.5 gallons/hr; tpy is actual usage & Maximum HAP content of 1.8 lb/gal
02	Material Balance	7.6 lb/gal VOC 3.5 lb/gal Acetone	None	N/A	Spray rate of 7.5 gallons/hr; tpy is actual usage & Maximum HAP content of 1.8 lb/gal

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
03	Material Balance	7.6 lb/gal VOC 3.5 lb/gal Acetone	None	N/A	Spray rate of 3.75 gallons/hr; tpy is actual usage & Maximum HAP content of 1.8 lb/gal
04	Material Balance	7.6 lb/gal VOC 3.5 lb/gal Acetone	None	N/A	Spray rate of 7.5 gallons/hr; tpy is actual usage & Maximum HAP content of 1.8 lb/gal
05	AP-42	0.03gr/scf	Cyclone	70%	
06	Material Balance	7.6 lb/gal VOC 3.5 lb/gal Acetone	None	N/A	Spray rate of 3.75 gallons/hr; tpy is actual usage & Maximum HAP content of 1.8 lb/gal
07	Material Balance	7.1 lb/gal VOC 0.7 lb/gal Acetone	None	N/A	Spray rate of 0.5 gallons/hr; tpy is actual usage & Maximum HAP content of 0.3 lb/gal
08	Material Balance	Mol fraction Vinyl Acetate = 0.15% Area of Surface = 446.1 m ² /hr	None	N/A	Method from Alliance for the Polyurethanes Industry for Adhesives/Coatings
09	Material Balance	7.1 lb/gal VOC 0.7 lb/gal Acetone	None	N/A	Spray rate of 0.5 gallons/hr; tpy is actual usage & Maximum HAP content of 0.3 lb/gal
10	Material Balance	7.6 lb/gal VOC 3.5 lb/gal Acetone	None	N/A	Spray rate of 7.5 gal/hr, tpy is actual usage & Maximum HAP content of 1.8 lb/gal

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
N/A				

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01 – 04, 06, & 08	TLV values	Varies (See TLV Table)	Continuously	Y
	VOC/HAP content	7.6 lb VOC per gallon 7.5 lb HAP per gallon	Continuously	Y
07 & 09	TLV values	Varies (See TLV Table)	Continuously	Y
	VOC/HAP content	7.1 lb per gallon	Continuously	Y
Facility	Annual VOC emissions	120.0 tons per year	Monthly	Y
	Single HAP	19.60 tons per year	Monthly	Y
	Total HAPs	23.00 tons per year	Monthly	Y
Facility	Acetone Content	3.5 lb per gallon	Continuously	Y
	Acetone Usage	19.60 tons per year	Monthly	Y
01 – 04, 06, 07, and 10	Subpart JJ Compliance	1.0 lbs solid deposit/lb VHAP emitted of compliant materials usage	Twice yearly	Y
	Subpart JJ Compliance	Various reports including work plans, operator training documentation, and usage of HAP	As required	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
08	Laminate area	4,800 ft ² per hour	Hourly	Y
09	Toluene Usage	3 gallons per month	Monthly	Y

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
05	20%	Department Guidance	Weekly observations

20. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
19 Natural Gas HVAC Heaters	A-1	0.22	0.05	0.18	2.24	2.63	0.006	0.006
Secondary Wood Shredder	A-13	0.2						

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1035-AOP-R6

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Mid-America Cabinets, Incorporated
 Permit Number: 1035-AOP-R7
 AFIN: 04-00247

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	148.6
Permit Type	Renewal No Changes	Permit Fee \$	0

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500

Check if Facility Holds an Active Minor Source or Minor Source General Permit ☐

If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ 0

Total Permit Fee Chargeable Emissions (tpy) 0

Initial Title V Permit Fee Chargeable Emissions (tpy)

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		17.6	17.6	0		
PM ₁₀		17.6	17.6	0	0	17.6
PM _{2.5}		0	0	0		
SO ₂		0	0	0	0	0
VOC		120	120	0	0	120
CO		0	0	0		
NO _x		0	0	0	0	0
Single HAP	<input type="checkbox"/>	19.6	19.6	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total HAP	<input type="checkbox"/>	23	23	0		
Acetone	<input checked="" type="checkbox"/>	11	11	0	0	11