

CLARK COUNTY
DEPARTMENT OF AIR QUALITY AND
ENVIRONMENTAL MANAGEMENT
500 South Grand Central Parkway, Box 555210, Las Vegas, Nevada 89155
Part 70 Operating Permit
Source: 482
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: CAPITAL CABINETS, A DIVISION OF MASTERBRAND CABINETS

SOURCE LOCATION:

3645 Losee Road
North Las Vegas, NV 89030
T20S, R61E, Section 11
Hydrographic Basin Number: 212

SOURCE ADDRESS:

3645 Losee Road
North Las Vegas, NV 89030

NATURE OF BUSINESS:

SIC Code 2434 – Wood Kitchen Cabinets
NAICS: 337110 – Wood Kitchen Cabinet and Countertop Manufacturing

RESPONSIBLE OFFICIAL:

Name: Gary Pettijohn
Title: General Manager of Nevada Operations
Phone: (702) 649-8733
Fax Number: (702) 649-6512

Permit Issuance: Date

Expiration Date: Date

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY AND ENVIRONMENTAL MANAGEMENT

Tina Gingras
Assistant Director, Clark County DAQEM

EXECUTIVE SUMMARY

Capital Cabinets (CC), a Division of MasterBrand Cabinets, a synthetic minor source for VOC and HAP; and a minor source for PM₁₀, NO_x, CO, and SO_x. However, the source is subject to 40 CFR 63, Subpart JJ and requires a Title V permit based on the past PTE and the standard applicability dates. CC is located at 3645 Losee Road, North Las Vegas, Nevada 89030, in the Las Vegas Valley airshed, hydrographic basin number 212. Hydrographic basin 212 is nonattainment for CO, PM₁₀, and ozone, and PSD for all other regulated air pollutants. The source manufactures kitchen cabinets and counter tops. The source is under Standard Industrial Classification (SIC) code 2434 – Wood Kitchen Cabinets and North American Industry Classification System (NAICS) code 811121 - Wood Kitchen Cabinet and Countertop Manufacturing.

The following table summarizes the potential to emit (PTE) for each regulated air pollutant:

PM ₁₀	NO _x	CO	SO _x	VOC	HAP
8.41	3.36	2.82	0.03	25.18	24.43

All general and specific conditions in the permit are federally enforceable unless explicitly denoted otherwise [AQR 19.4.2].

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PROPOSED

I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
BCC	Clark County Board of County Commissioners
BHP	Brake Horse Power
CAO	Field Corrective Action Order
CE	Control Efficiency
CF	Control Factor
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CPI	Urban Consumer Price Index
DAQEM	Clark County Department of Air Quality & Environmental Management
EF	Emission Factor
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HP	Horse Power
kW	kiloWatt
MMBtu	Millions of British Thermal Units
NAC	Nevada Administrative Code
NAICS	North American Industry Classification System
NEI	Net Emission Increase
NO _x	Nitrogen Oxides
NOV	Notice of Violation
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
scf	Standard Cubic Feet
SCC	Source Classification Codes
SCR	Selective Catalytic Reduction
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TSD	Technical Support Document
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. GENERAL REQUIREMENTS

1. The Permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act (Act) and is grounds for enforcement action; for permit termination, revocation and reissuance or modification; or for denial of a permit renewal application. [AQR 19.4.1.6.a]
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. [AQR 19.4.1.5]
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. Failure to pay Part 70 permit fees may result in citations or suspensions or revocation of the Part 70 Permit. [AQR 19.4.1.7]
4. The permit does not convey any property rights of any sort, or any exclusive privilege. [AQR 19.4.1.6.d]
5. The Permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with the Control Officer, or any individual to whom authority has been duly delegated for the performance of any duty by the AQR. [AQR 5.1]
6. The Permittee owning, operating, or in control of any equipment or property who shall cause, permit, or participate in any violation of the AQR shall be individually and collectively liable to any penalty or punishment imposed by and under the AQR. [AQR 8.1]
7. The Permittee shall continue to comply with applicable requirements for which the Permittee is in compliance. [AQR 19.3.3.8.b]
8. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [AQR 19.3.2]
9. The Permittee may request confidential treatment of any records in accordance with AQR Section 19. Emission data, standards or limitations [all terms as defined in 40 CFR 2.301(a)] or other information as specified in 40 CFR 2.301 shall not be considered eligible for confidential treatment. The Administrator and the Control Officer shall each retain the authority to determine whether information is eligible for confidential treatment on a case-by-case basis. [AQR 19.3.1.3 and 40 CFR 2.301]

B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS

1. The Permittee shall not make a modification, as defined in AQR Section 0, to the existing source prior to receiving an Authority to Construct (ATC) from the Control Officer. [AQR 12.1.1.1]
2. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for the permit modification, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [AQR 19.4.1.6.c]
3. Any request for a permit revision must comply with the requirements of AQR Section 19. [AQR 19.5.5.1]

4. The Permittee shall not build, erect, install or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR 60.12]*
5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit, provided the Permittee conforms to the applicable requirements of AQR Sections 12 and 58. *[AQR 19.4.1.11]*
6. For purposes of permit renewal, the Permittee shall submit a timely and complete application. A timely application is one submitted between six (6) months and 18 months prior to the date of permit expiration. *[AQR 19.3.1.1.c]*
7. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with AQR Subsections 19.3.1.1.c and 19.5.2 in which case the permit shall not expire and all terms and conditions of the permit shall remain in effect until the renewal permit has been issued or denied. *[AQR 19.5.3.2]*

C. REPORTING/NOTIFICATIONS/PROVIDING INFORMATION REQUIREMENTS

1. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer 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 Control Officer copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. *[AQR 19.4.1.6.e]*
2. The Permittee shall allow the Control Officer or an authorized representative, upon presentation of credentials *[AQR 4.3 and 19.4.3.2]*:
 - a. entry upon the Permittee's premises where the source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - b. access to inspect and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - c. access to inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. access to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
3. Upon request of the Control Officer, the Permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and may require that such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from source. An authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.4]*

D. COMPLIANCE REQUIREMENTS

1. The Permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the terms and conditions of this permit. [AQR 19.4.1.6.b]
2. Any person who violates any provision of this operating permit, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by DAQEM is guilty of a civil offense and shall pay civil penalty levied by the Air Pollution Control Hearing Board/Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. [AQR 9.1]
3. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review as provided in Chapter 233B of Nevada Revised Statutes (NRS). [AQR 9.12]
4. The Permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. [AQR 13.1.7]
5. Requirements for compliance certification with terms and conditions contained in the operating permit, including emission limitations, standards, or work practices, are as follows [AQR 19.4.3]:
 - a. the Permittee shall submit compliance certifications annually in writing to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for the previous calendar year will be due on January 30 of each year;
 - b. compliance shall be determined in accordance with the requirements detailed in AQR 19.4.1.3, record of periodic monitoring, or any credible evidence; and
 - c. the compliance certification shall include:
 - i. identification of each term or condition of the permit that is the basis of the certification;
 - ii. the Permittee's compliance status and whether compliance was continuous or intermittent;
 - iii. methods used in determining the compliance status of the source currently and over the reporting period consistent with Subsection 19.4.1.3; and
 - iv. other specific information required by the Control Officer to determine the compliance status of the source. [AQR 19.4.3.5]
6. The Permittee shall report, in writing, to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) deviations from permit requirements as soon as practicable but not to exceed ten (10) calendar days from discovery of the deviation. Such reports shall include the probable cause of such deviations and any corrective actions or preventative measures taken. [AQR 19.4.1.3]
7. The Permittee shall report to the Control Officer any upset, breakdown, malfunction or emergency, as defined in Section 0, which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below [AQR 25.2]:

- a. within one (1) hour of the onset of the event, the report shall be communicated by phone (702) 455-5942, or by fax (702) 383-9994.
 - b. within 72 hours of the onset of the event, the detailed written report shall be submitted. Such reports shall include the probable cause of the excess emissions, emission calculations and any corrective actions taken.
8. The Permittee shall include a certification of truth, accuracy, and completeness by a responsible official when submitting any application form, report, or compliance certification pursuant to this operating permit. This certification and any other certification required shall state, "Based on the information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." This statement shall be followed by the signature and printed name of the responsible official certifying compliance and the date of signature. [AQR 19.3.4]

E. PERFORMANCE TESTING REQUIREMENTS

1. Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the DAQEM regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.5]
2. Upon request of the Control Officer, the Permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.6]
3. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) and to the Enforcement Office of the US EPA, Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105), not less than 45 or more than 90 days prior to the anticipated date of the performance test. [AQR 14.10]
4. The Permittee shall provide all requests for any alternative test methods to EPA for approval. [AQR 14.1 and 40 CFR 60.8(b)]
5. The Permittee shall submit a report describing the results of the performance test to the Control Officer within 60 days from the end of the performance test. [AQR 14.12]
6. Pursuant to AQR Section 10, the Permittee of any stationary source or emission unit that fails to demonstrate compliance with the emissions standards or limitations during any subsequent performance test shall submit a compliance plan to the Control Officer within 90 days from the end of the performance test. [AQR 12.8 and AQR 19.4.1.3]
7. Additional performance testing may be required by the Control Officer. [AQR 4.5]

III. SOURCE-WIDE POTENTIAL TO EMIT (PTE) SUMMARY

[Authority for all values, limits, and conditions in this section: NSR ATC/OP 482, Modification 8, Revision 0, (07/07/08) and ATC 482, Modification 9, Revision 0, (06/01/09)]

Capital Cabinets is a synthetic minor source for VOC and HAP; and a minor source for PM₁₀, NO_x, CO, and SO_x:

Table III-1: Source-wide PTE (tons per year)

	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Tons/Year	8.41	3.36	2.82	0.03	25.18	24.43
Major Source Thresholds	70	50	70	70	50	25¹

¹25 tons for combination of all HAPs (no single HAP exceeds 10 tons).

IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit (OP) is defined to consist of the emission units and associated appurtenances summarized in Table IV-A-1. [AQR 19.2.1 and 19.3.3.3]

Table IV-A-1: List of Emission Units

EU	Description	SCC
A02	Spray Booth A02, M/N: N/A, S/N: 22933	40201901
A06	Global Finishing Solutions Spray Booth A06, M/N: CIDPP-127, S/N: 24717	40201901
A07	Global Finishing Solutions Spray Booth A07, M/N: CIDPP-127, S/N: 24717	40201901
A08	Global Finishing Solutions Spray Booth A08, M/N: CIDPP-127, S/N: 47927	40201901
A09	Global Finishing Solutions Spray Booth A09, M/N: CIDPP-127, S/N: 47927	40201901
A10	Superfici Spray Booth A10, M/N: ELMAG, S/N: 440286-010	40201901
A11	Superfici Spray Booth A11, M/N: ELMAG, S/N: 440286-004	40201901
A12	Superfici Spray Booth A12, M/N: ELMAG, S/N: 440286-002	40201901
A13	Superfici Spray Booth A13, M/N: ELMAG, S/N: 440286-011	40201901
A14	Spray Booth A14, M/N: N/A, S/N: 429213	40201901
B01	MAC Wood Working equipment with Dust Collection System and Baghouse, 70,000 cfm, S/N: 107883	30700701
B03	Finish Technologies Natural Gas-fired Make-up Air Heater-1, 2,592 MMBtu/hr; M/N: TOT224HBL, S/N: 55616A	10500106
B04	Finish Technologies Natural Gas-fired Make-up Air Heater-2, 2,592 MMBtu/hr; M/N: TOT224HBL, S/N: 55799	10500106
B08	Finish Technologies Natural Gas-fired Make-up Air Heater-3, 2,592 MMBtu/hr; M/N: TOT224HBL, S/N: 55616B	10500106
B09	Donaldson Torit Wood Working equipment with Dust Collection System and Baghouse. 26,000 cfm; M/N: DF04-48, S/N: IG931778-01	30700701
B10	Unpaved Parking Lot, 7.56 acres	30502507
B11	Wood Working equipment with Carter Day (Donaldson) Dust Collection System and Baghouse. 18,000 cfm	30700701

The following units or activities are present at this source, but are categorically exempt pursuant to AQR Section 12. The emissions from these units or activities, when added to the PTE of the source presented in Table IV-A-1, will not make any pollutant major for this source.

Table IV-A-2: Categorically Exempt Units or Activities

Electric Heaters (Total 11)

Natural Gas-fired Furnace-1, 0.15 MMBtu/hr
Natural Gas-fired Furnace-2, 0.15 MMBtu/hr
Natural Gas-fired Water Heater, 0.722 MMBtu/hr

B. EMISSION LIMITATIONS AND STANDARDS

[Authority for all values, limits, and conditions in this section: NSR ATC/OP 482, Modification 8, Revision 0, (07/07/08), and ATC 482, Modification 9, Revision 0, (06/01/09)]

1. Emission Limits

- Neither the actual nor the allowable emissions from each emission unit shall exceed the PTE listed in Table IV-B-1.

Table IV-B-1: Emission Units PTE (tons per rolling 12 months)

EU	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
A02 ¹	0.17	0.00	0.00	0.00		
A06 ¹	0.17	0.00	0.00	0.00		
A07 ¹	0.17	0.00	0.00	0.00		
A08 ¹	0.17	0.00	0.00	0.00		
A09 ¹	0.17	0.00	0.00	0.00		
A10 ¹	0.12	0.00	0.00	0.00		
A11 ¹	0.13	0.00	0.00	0.00		
A12 ¹	0.17	0.00	0.00	0.00		
A13 ¹	0.17	0.00	0.00	0.00		
A14 ¹	0.12	0.00	0.00	0.00		
B01 ²	2.63	0.00	0.00	0.00	0.00	0.00
B03	0.09	1.12	0.94	0.01	0.06	0.01
B04	0.09	1.12	0.94	0.01	0.06	0.01
B08	0.09	1.12	0.94	0.01	0.06	0.01
B09 ³	0.98	0.00	0.00	0.00	0.00	0.00
B10	2.29	0.00	0.00	0.00	0.00	0.00
B11 ⁴	0.68	0.00	0.00	0.00	0.00	0.00

¹ VOC and HAP, including volatile organic HAPs (VHAPs) emission limits listed for 10 spray booths (EU: A02 and A06 through A14) in Table III-B-1 are average values and can vary depending on the production rate of each spray booth.

² EU: B01 - 70,000 cfm, emissions 0.001 grains/scf.

³ EU: B09 - 26,000 cfm, emissions 0.001 grains/scf.

⁴ EU: B11 - 18,000 cfm, emissions 0.001 grains/scf.

- Emissions of VOCs and HAPs (including VHAPs) as a result of the operation of the spray booths (EU: A02 and A06 through A14) shall not exceed the limits listed in Table IV-B-2.

Table IV-B-2: Source Emission Limitations for Wood Cabinet Coating Operations

Regulated Air Pollutant	Tons/Year	Tons/Month
VOCs	25.00	3.00
HAPs	24.40	3.00
Single HAP	9.44	---

3. The Permittee shall meet VHAP emission limitations given in Table IV-B-3 [40 CFR 63, Subpart JJ]:

Table IV-B-3: Summary of Emission Limits – Part 63, Subpart JJ

Emission Point	Emission Limits
Finishing Operations:	
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	1.0 ¹
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):	
—stains	1.0 ¹
—washcoats	1.0 ^{1,2}
—sealers	1.0 ¹
—topcoats	1.0 ¹
—basecoats	1.0 ^{1,2}
—enamels	1.0 ^{1,2}
—thinners (maximum percent VHAP allowable); or	10
(c) As an alternative, use control device; or	1.0 ³
(d) Use any combination of (a), (b), and (c)	1.0
Cleaning Operations:	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8
Contact Adhesives:	
(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	NA ⁴
ii. For foam adhesives used in products that meet flammability requirements	1.8
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	1.0
(b) Use a control device	1.0 ⁵

¹ The limits refer to the VHAP content of the coating, as applied.

² 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.

³ 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.

⁴ There is no limit on the VHAP content of these adhesives.

⁵ 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. Source: [60 FR 62936, Dec. 7, 1995, as amended at 62 FR 30260, June 3, 1997]

4. The Permittee shall limit VHAP emissions from finishing operations by meeting the emission limitations presented in Table IV-B-3. [40 CFR 63.802]

5. The Permittee shall limit VHAP emissions from contact adhesives (including foam adhesives, but excluding aerosol adhesives and contact adhesives applied to nonporous substrates) by using adhesives with VHAP that contain no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied. [40 CFR 63.802]
6. The Permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied. [40 CFR 63.802]
7. All sealers, including ultra violet cured coatings, used by the Permittee shall have ultra-low VOC content. Acetone-based sealers shall not exceed 0.24 pounds of VOC per pound of solid, and waterborne sealers shall not exceed 0.18 pounds of VOC per pound of solid. [40 CFR 63.802]
8. Pursuant to AQR Section 26, emissions from the spray booth shall not exceed an average 20 percent opacity for a period of more than 6 consecutive minutes, as determined by observations performed in accordance with EPA Method 9.
9. The Permittee shall not allow visible emissions from baghouses filter socks and dust collectors to exceed an average 20 percent opacity for a period of more than 6 consecutive minutes, as determined by observations performed with accordance with EPA Method 9. [AQR 19.4.1.3]
10. The Permittee shall not allow visible emissions from unpaved parking lot to exceed average 20 percent opacity for a period of more than 6 consecutive minutes, when viewed in accordance with EPA Method 9. [AQR 19.4.1.3]
11. The Permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters, and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the Permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating. [40 CFR 63.803]

2. Production Limits

1. Production throughput of various wood cabinet coating materials shall be limited so that emissions of VOCs and HAPs (including VHAPs) as a result of the operation of the spray booths (EU: A01 through A15) will not exceed the permitted emission limits listed in Table IV-B-2. [NSR ATC/OP 482, Modification 8, Revision 0, (07/07/08)]
2. The air flow through the dust control systems shall not exceed the following: [NSR ATC/OP 482, Modification 8, Revision 0, (07/07/08 and ATC 482, Modification 9, Revision 0, (06/01/09))]

Table IV-B-4: Summary of Wood Working System Dust Collectors

Description	Air Flow
B01- MAC Wood Working equipment with Dust Collection System and Baghouse,	70,000 cfm
B09 - Donaldson Torit Wood Working equipment with Dust Collection System and Baghouse.	26,000 cfm
B11 - Wood Working equipment with Carter Day (Donaldson) Dust Collection System and Baghouse.	18,000 cfm

3. Emission Controls

Surface Coating Operations

1. The Permittee shall not operate spray booths unless all exhaust air passes through appropriate filter media. The dry filter media must cover all filtering area of the spray booth. [AQR 19.4.1.1]
2. The Permittee shall operate all emission control equipment according to manufacturer's recommendations. Dry filters associated with the spray booths' dust collection system must be changed at sufficient intervals to prevent a decrease in their effectiveness, and to prevent them from clogging. [AQR 19.4.1.1]
3. No person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or materials which cause a nuisance, such as over spray or excessive odors from the spray painting booth. [AQR 19.4.1.1]
4. The Permittee shall not use the cleaning and washoff solvents that contain any of the pollutants listed in Table 4 of the 40 CRF 63, Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA. [40 CRF 63.803]
5. The Permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials. [40 CRF 63.803]
6. The Permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances [40 CRF 63.803]:
 - a. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - b. for touchup and repair under the following conditions:
 - i. the touchup and repair occurs after completion of the finishing operation; or
 - ii. the touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - c. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - d. when emissions from the finishing application station are directed to a control device;
 - e. the conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - f. the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any spray application technology. The Permittee shall demonstrate technical or economical infeasibility by submitting to the Control Officer a video tape, a technical report, or other documentation that supports the Permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the Permittee's claim of technical or economic infeasibility:
 - i. the production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

7. The Permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container. [40 CRF 63.803]
8. The Permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container. [40 CRF 63.803]
9. The Permittee shall control emissions from washoff operations by [40 CRF 63.803]:
 - a. using normally closed tanks for washoff; and
 - b. minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

Woodworking Operations

10. The Permittee shall connect all wood working processes including cutting, sanding, blasting, and surface preparation to a dust collection system at all times when such equipment is in operation and the PM₁₀ emissions shall be controlled by a fabric filter or device with equivalent or better control efficiency than 0.001 grains per dry standard cubic foot. [AQR 19.4.1.1]
11. If baghouses, filter socks or dust collectors exhibit visible emissions the Permittee shall shut down the processes controlled by the device, and promptly repair that device before recommencing operation. [AQR 19.4.1.1]
12. The Permittee shall employ good housekeeping practices to prevent the accumulation and/or dispersal of particulate matter from sanding, blasting or surface preparation carried out in conjunction with surface coating operations. No more than 0.25 inches of particulate matter shall accumulate on surrounding surfaces at any time. [AQR 19.4.1.1]

Fuel Burning Equipment

13. The Permittee shall combust only natural gas in all stationary fuel burning equipment. [AQR 19.4.1.1]
14. The Permittee shall operate all fuel burning equipment in accordance with manufacturer's specifications combined with good operating practices. [AQR 19.4.1.1]

Unpaved Parking

15. The Permittee shall apply dust palliatives to vehicle travel lanes within the unpaved parking lot and uniformly apply and maintain surface gravel to a depth of two (2) inches on the vehicle parking areas. AQR 19.4.1.1 and ATC 482, Modification 9, Revision 0, (06/01/09))]

C. MONITORING

Surface Coating Operations

1. The Permittee shall comply with the monitoring requirements by using any of the methods presented below [40 CRF 63.804]:
 - a. Calculate the average VHAP content for all finishing materials used by the Permittee using Equation 1 and maintain a value of E no greater than 1.0:

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

Equation 1

+9

Where

C_c = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given

- in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).
- M = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).
- S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.
- W = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.
- b. use complaint 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 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 coating and thinner; and
 - iii. demonstrate that each washcoat, basecoat, and enamel that is formulated by the Permittee is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and thinner containing no more than 3.0 percent VHAP by weight.
 - c. the Permittee can use any combination of the averaging approach, as described in point 1 a., and use any combination of complaint materials as described in point 1b.
2. The Permittee shall demonstrate continuous compliance with the monitoring requirements by submitting the results of the averaging calculation (Equation 1) for each month within each quarter and submitting a compliance certification with the quarterly reports [40 CFR 63.804]:
- a. the compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The Permittee is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation for of the standard for each day of operation during the month, unless the Permittee can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period; or
 - b. the compliance certification shall state that complaint stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners as applicable, have been used each day in the quarterly reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The Permittee is in violation of the permit whenever a noncompliant coating, as demonstrated by the records or a sample of the coating, is used.
 - c. the compliance certification shall be signed by the responsible official.
3. The Permittee shall demonstrate continuous compliance when applying coatings using continuous coaters by following the procedures below [40 CFR 63.804]:
- a. using complaint coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using complaint thinners, and submitting a compliance certification with the required quarterly reports:
 - i. the compliance certification shall state that complaint coatings have been used each day in the quarterly reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The Permittee is in violation

- of the permit whenever a noncompliant coating, as demonstrated by the records or 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. the compliance certification shall be signed by the responsible official.
 - b. using complaint coatings, as determined by the VHAP content of the coating in the reservoir, using complaint 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 addition and submitting a compliance certification with the quarterly report:
 - i. the compliance certification shall state that complaint coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the quarterly 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 quarterly reporting period.
 - ii. the compliance certification shall be signed by the responsible official.
 - iii. the Permittee is in violation of the permit when a sample of the as-applied coating exceeds the applicable limit of 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
 4. VOC and HAP emission calculations for each coating material shall be based on the actual VOC and HAP content in the compounds used as provided by the manufacturer. *[NSR ATC/OP 482, Modification 8, Revision 0, (07/07/08)]*
 5. Compliance with the VOC emission limits shall be demonstrated by weekly emission log maintained by the Permittee. The emission log shall: *[AQR 19.4.1.3]*
 - a. record the manufacturer product number, ID, or code for all production coatings, clean-up solvents, thinners, reducers, additives, and contact cement (or adhesives) used at the facility;
 - b. record the weekly usage of all production coatings; nonexempt VOC emitting clean-up solvents, thinners, reducers, and additives; and contact cement (or adhesives) used at the source;
 - c. record the VOC content as applied of all production coatings, nonexempt VOC emitting clean-up solvents, thinners, reducers, and additives; and contact cement (or adhesives) used at the source;
 - d. calculate the source VOC emissions for each work week by the end of the following work week based on the following equation:
$$\text{VOC (tons)} = [(\text{Coating Usage, gal}) \times (\text{Coating Density, lb/gal}) \times (\text{VOC Content of Coating, \% by Wt.})] + [(\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})] - [(\text{VOC Recovered, lb})] / 2000 \text{ lbs/ton} + \text{VOC from B03, B04, B08}$$

Where VOC Recovered is calculated as follows:
(VOC Recovered, lb) = (Clean-up Solvent and Coating Materials Recovered, gal) x (Density of Recovered Materials, lb/gal) x (VOC Content of Recovered Materials, % by Weight);
 - e. the operating log shall calculate the source VOC emissions on a calendar monthly and rolling 12-month basis by summing the weekly emissions to show compliance with the annual VOC emissions cap and the monthly VOC emissions limit; and

- f. the calculation of total calendar monthly and rolling 12-month source-wide VOC emissions shall be completed by the end of the first week of the following calendar month.
6. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water) unless the manufacturer's recommendations for use indicate a different pressure drop value. [AQR 19.4.1.3]
7. The Permittee shall inspect daily the spray booths and all ancillary equipment for leaks, malfunctions, pressure drop and proper operation of gauges. A daily log must be kept of such inspections. The log must also show any discrepancies, and record the steps taken to correct them. [AQR 19.4.1.3]

Woodworking Operations

8. The Permittee shall conduct daily monitoring of the pressure drop across each baghouse cell with the installation and operation of a pressure differential (Magnehelic) gauge per manufacturer's specifications. [AQR 19.4.1.3]
9. The Permittee shall demonstrate compliance with the opacity limitation of EUs B01, B09 and B11 on a monthly basis in accordance with 40 CFR 60 Appendix A Method 22 (Visual determination of fugitive emissions). The observations should be made for a period of 6 minutes in order to confirm that no visible emissions are present. If visible emissions are present, compliance with the opacity limitation shall be further demonstrated in accordance with 40 CFR 60 Appendix A, Method 9 (Standards for Opacity). [AQR 19.4.1.3]

Other Monitoring

10. During days when the plant is operating, on-site personnel shall perform visible emissions checks on all operations and the unpaved parking lot daily, and more often as necessary, and shall investigate any occurrence of visible fugitive emissions. [AQR 19.4.1.3]
11. If the observer, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation. [AQR 19.4.1.3]
12. If the observer sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, then the Permittee shall have a certified VE observer take an EPA Method 9 observation of the plume and record the results. [AQR 19.4.1.3]
13. If Method 9 readings can not be obtained, the observer shall also indicate in the log: a) the reason why a Method 9 could not be performed, b) the color of the emissions, c) whether the emissions were light or heavy, d) the cause of the abnormal emissions, and e) any corrective action taken. [AQR 19.4.1.3]
14. The Permittee shall investigate any occurrence of visible fugitive dust. Corrective actions shall be immediately taken to correct causes of fugitive dust in excess of allowable opacity limits. [AQR 19.4.1.3]

D. TESTING

Surface Coating Operations

1. The Permittee shall test the VHAP content of the liquid coatings, the solids content of the coatings, and the density of the coatings. *[40 CFR 63.805]*
2. The Permittee may use Certified Product Data Sheets (CPDS) in determining the VHAP content, the solids content and the density of liquid coatings. When CPDS are not available, the Permittee will apply testing requirements specified in points D.3 through D.5.
3. The Permittee shall use EPA Method 311, (40 CFR Part 63, Appendix A) in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to quantify those VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. *[40 CFR 63.805]*
4. The Permittee shall use the EPA Method 24 (40 CFR Part 60, Appendix A) to determine the solids content by weight and density coatings. If it is demonstrated to the satisfaction of the Control Officer that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. *[40 CFR 63.805]*
5. The Permittee may request to use an alternative method for determining the VHAP content of the coating, in the event of any inconsistency between the EPA Method 24 or Method 311 test data and the Permittee's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, the Permittee could demonstrate that the formulation data were correct. *[40 CFR 63.805]*

Woodworking Operations

6. The Permittee shall conduct initial performance testing of the wood working system (EUs: B01, B09 and B11) using EPA Methods 1 through 5 to demonstrate compliance with emission limitations specified in this permit. No subsequent performance testing shall be conducted if the initial performance test demonstrates compliance with the conditions of this permit.

E. RECORD KEEPING

1. All records, logs, etc. shall be made available to the Control Officer. *[AQR 19.4.1.3]*
2. All records, logs, etc., or a copy thereof, shall be kept on site for a minimum of 5 years from the date the measurement, or data was entered. *[AQR 19.4.1.3]*
3. The Permittee shall maintain records that contain, at minimum, the following information *[AQR 19.4.1.3, and 40 CFR 63.806]*:
 - a. records of the total weekly usage (in gallons or pounds) of each VOC and HAP containing compound (paints, basecoats, primers, reducers, thinners, solvents, etc.) shall be made available to DAQEM upon request;
 - b. records demonstrating the VHAP contents in kg VHAP/kg solid (lb VHAP/lb solids) of each compound used as coating, thinner, reducer, sealer, additive, contact adhesive, and clean-up solvent to demonstrate that the monthly and annual emissions (rolling 12-month total) of VHAPs do not exceed limits contained in this permit;
 - c. records demonstrating the VOC contents in kg VOC/kg solid (lb VOC/lb solids) of each compound used as coating, thinner, reducer, sealer, additive, contact adhesive, and clean-up solvent to demonstrate that the monthly and annual emissions (rolling 12-month total) of VOCs do not exceed limits contained in this permit;
 - d. weekly and monthly VOC and HAP (including VHAPs) emission calculations;

- e. quarterly analysis of a composite paint waste sample to provide the VOC content value to be used in the VOC calculation. (This condition will only apply if the source chooses to deduct the VOC content of the waste materials shipped off-site);
 - f. monthly records of natural gas usage by fuel burning equipment;
 - g. logs of daily visible emissions checks with date and time of each observation, with any corrective action that was required;
 - h. a log of Method 22 inspections of EUs: B01, B09 and B11;
 - i. a log of Method 9 opacity observations with date and time of each observation, with any corrective action taken that was required;
 - j. a log of spray paint booth inspections;
 - k. records of maintenance and repair; MSDS or records demonstrating the VOC and HAP content for each compound; and
 - l. performance test results.
4. The Permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1. [40 CFR 63.806]
 5. The Permittee shall maintain the following records, in addition to records required in E-3 (a-c), when applying coatings using continuous coaters [40 CFR 63.806]:
 - a. solvent and coating additions to the continuous coater reservoir;
 - b. viscosity measurements; and
 - c. data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
 6. 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 63.806]:
 - a. records demonstrating that the operator training program is in place;
 - b. records collected in accordance with the inspection and maintenance plan;
 - c. records associated with the cleaning solvent accounting system;
 - d. 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 quarter;
 - e. records associated with the formulation assessment plan; and
 - f. copies of documentation such as logs developed to demonstrate that other provisions of the work practice implementation plan are followed.
 7. Records and data required by this permit to be maintained by the Permittee may, at the Permittee's expense, be audited at any time by a third party selected by the Control Officer. This third party shall be subject to the same business confidentiality terms binding DAQEM during investigations and data gathering. [AQR 19.4.1.3]
 8. Records demonstrating the VOC and HAP content of each VOC containing compound shall be kept on-site by the Permittee and made available to DAQEM upon request. [AQR 19.4.1.3]
 9. The Permittee shall maintain a Risk Management Plan (RMP) for the storing, handling, and use of any chemicals subject to accidental release prevention regulations pursuant to 40 CFR 68. The Permittee shall submit an RMP to the Administrator by the date specified in 40 CFR

68.10.and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification. [AQR 19.4.1.3]

10. The Control Officer reserves the right to require additional records and record keeping to determine the nature and quantity of emissions. [AQR 19.4.1.3]

F. REPORTING

1. The Permittee is responsible for submitting quarterly reports to DAQEM. [AQR 19.4.1.3]
2. Each quarterly report shall [AQR 19.4.1.3]:
 - a. include, as the first page of text, a signed certification containing the sentence, "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete." This statement shall be signed and dated by a responsible official of the company;
 - b. include quarterly summaries of items listed in Conditions IV-E-3-a through f;
 - c. include quarterly summaries of any permit deviations, their probable cause and corrective actions or preventative actions taken;
 - d. be based on the calendar quarter (including partial calendar quarters);
 - e. be submitted within 30 days after the end of the calendar quarter; and
 - f. be addressed to the attention of the Control Officer.
3. Regardless of the date of issuance of this permit, the schedule for the submittal of reports to the Control Officer shall be as follows [AQR 19.4.1.3]:

Table IV-D-1: Quarterly Reporting Schedule

Quarter	Applicable Period	Due Date ¹	Required Contents
1	January, February, March	April 30 each year	Quarterly Report for 1st Calendar Quarter
2	April, May, June	July 30 each year	Quarterly Report for 2nd Calendar Quarter
3	July, August, September	October 30 each year	Quarterly Report for 3rd Calendar Quarter
4	October, November, December	January 30 each year	Quarterly Report for 4th Calendar Quarter
4	Calendar Year	January 30 Each year	Annual Compliance Certification Report

¹Each report must be received by DAQEM on or before the due date listed. If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

4. The following requirements apply to annual emissions inventory reports: [AQR 19.4.1.3]
 - a. The annual emissions inventory shall be received by DAQEM no later than March 31 after the reporting year.
 - b. The Permittee shall submit the report to DAQEM.
 - c. The report shall be addressed to the attention of the DAQEM Control Officer.
5. Each performance test report shall: [AQR 19.4.1.3]
 - a. have, as the first page of text, a signed Annual Throughput Report and Certification Form;
 - b. be addressed to the attention of the DAQEM Control Officer;
 - c. be submitted within sixty (60) days from the end of an annual test; and
 - d. contain the results of the test.

6. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements and requirements of applicable regulations. *[AQR 4.4 and AQR 19.4.1.3]*

V. OTHER REQUIREMENTS

1. 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. The plan shall be developed no more than 60 days after the compliance date. *[40 CRF 63.803]*
2. The written work practice implementation plan shall be available for inspection by the Control Officer. *[40 CRF 63.803]*
3. The Permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of 40 CFR 63, Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the issuance date of the initial Part 70 OP. All personnel shall be given refresher training annually. *[40 CRF 63.803]*
4. The Permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at minimum, the following *[40 CRF 63.803]*:
 - a. list of all current personnel by name and job description that are required to be trained;
 - b. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - c. lesson plans for courses to be given at the initial and the annual refresher training that include, at minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
5. The Permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies *[40 CRF 63.803]*:
 - a. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
 - b. an inspection schedule;
 - c. methods for documenting the date and results of each inspection and any repairs that were made;
 - d. the time frame between identifying the leak and making the repair, which adheres, at minimum, to the following schedule:
 - i. a first attempt at repair (e.g. tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - ii. final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

6. The Permittee shall develop an organic HAP solvent accounting form to record [40 CRF 63.803]:
 - a. the quantity and type of organic HAP solvent used each month for washoff and cleaning as defined in 40 CFR 63.801;
 - b. the number of pieces washed off, and the reason for the washoff; and
 - c. the quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
7. The Permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that [40 CRF 63.803]:
 - a. identifies VHAP from the list presented in Table V-1 that are being used in finishing operations by the Permittee:

Table V-1: List of VHAP of Potential Concern Identified by Industry

CAS No.	Chemical Name	EPA de minimis, tons/year
68122	Dimethyl formamide	1.0
50000	Formaldehyde	0.2
75092	Methylene Chloride	4.0
79469	2-Nitropropane	1.0
78591	Isophorone	0.7
1000425	Styrene monomer	1.0
108952	Phenol	0.1
111422	Dimethanolamine	5.0
109864	2-Methoxyethanol	10.0
111159	2-Ethoxyethyl acetate	10.0

- b. establishes a baseline level of usage by the Permittee, for each VHAP identified in Table V-1. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in Table V-1. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16.
- c. track the annual usage of VHAP identified in Table V-1 by the Permittee that is present in amounts subject to MSDS reporting required by OSHA.
- d. If the annual usage of the VHAP identified in Table V-1 exceeds its baseline level, then the Permittee shall provide a written notification to the Control Officer that describes the amount of the increase and explains the reasons to exceedance of the baseline level. The following explanations would relieve the Permittee from further action, unless the Permittee is not in compliance with any AQR regulations or requirements for that VHAP:
 - i. the exceedance is no more than 15.0 percent above baseline level;
 - ii. usage of the VHAP is below the de minimis level presented in Table V-1;
 - iii. the source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg of solids (1lb VOC/lb solids), as applied.
- e. If none of the above explanations are the reason for the increase, the Permittee shall confer with the Control Officer to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing usage. The evaluation of whether the technology is practical and reasonable shall be based on cost, quality, and marketability of the product, whether the technology is being used

- successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the Control Officer and the Permittee. If there are no practical and reasonable solutions, the Permittee shall need take no further action. If there are solutions, the Permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- f. If the Permittee uses a VHAP of potential concern listed in Table 6 of 40 CRF 63, Subpart JJ for which baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in Table 6 of 40 CRF 63, Subpart JJ for that chemical. The Permittee shall track the annual usage of each VHAP of potential concern identified in Table 6 of 40 CRF 63, Subpart JJ that is present in amounts subject to MSDS reporting as required by OSHA. If usage, of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of 40 CRF 63, Subpart JJ for that chemical, then the affected source shall provide an explanation to the Control Officer that documents the reason for the exceedance of the de minimis level.
8. The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC) compound as a working fluid, unless such fluid has been approved for sale in such use by the Administrator. The Permittee shall keep record of all paperwork relevant to the applicable requirements of 40 CFR 82 on site. [40 CFR 82]

ATTACHMENT 1

APPLICABLE REGULATIONS

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. Nevada Revised Statutes (NRS), Chapter 445B.
2. Clark County Air Quality Regulations (CCAQR) Applicable CCAQR Sections:

Citation	Title
CCAQR Section 0	Definitions
CCAQR Section 2	Air Pollution Control Board
CCAQR Section 4	Control Officer
CCAQR Section 5	Interference with Control Officer
CCAQR Section 6	Injunctive Relief
CCAQR Section 8	Persons Liable for Penalties – Punishment: Defense
CCAQR Section 9	Civil Penalties
CCAQR Section 10	Compliance Schedule
CCAQR Section 11	Ambient Air Quality Standards
CCAQR Section 12	Preconstruction Review for New or Modified Stationary Sources
CCAQR Section 12.5	Air Quality Models
CCAQR Section 16	DAQEM Operating Permits
CCAQR Section 17	Dust Control Permit for Construction Activities Including Surface Grading and Trenching
CCAQR Section 18	Permit and Technical Service Fees
CCAQR Section 19	40 CFR Part 70 Operating Permits
CCAQR Section 20.1.1 Subpart A	Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) – General Provisions
CCAQR Section 20.1.15	JJ – National Emission Standards for Wood Furniture Manufacturing Operations
CCAQR Section 24	Sampling and Testing - Records and Reports
CCAQR Section 25	Upset/Breakdown, Malfunctions
CCAQR Section 26	Emissions of Visible Air Contaminants
CCAQR Section 40	Prohibition of Nuisance Conditions
CCAQR Section 41	Fugitive Dust
CCAQR Section 42	Open Burning
CCAQR Section 43	Odors in the Ambient Air
CCAQR Section 55.5	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area
CCAQR Section 60	Evaporation and Leakage
CCAQR Section 80	Circumvention
CCAQR Section 90	Fugitive Dust from Open Areas and Vacant Lots
CCAQR Section 91	Fugitive Dust from Unpaved Roads, Unpaved Alleys, and Unpaved Easement Roads
CCAQR Section 92	Fugitive Dust from Unpaved Parking Lots

3. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq
4. Title 40 of the Code of Federal Regulations (40 CFR) Applicable 40 CFR Subsections:

Citation	Title
40 CFR Part 52.1470	SIP Rules

Citation	Title
40 CFR Part 63, Subpart A	National Emissions Standards for Hazardous Air Pollutants for Source Categories(NESHAP) – General Provisions
40 CFR Part 63, Subpart JJ	National Emissions Standards for Hazardous Air Pollutants for Source Categories(NESHAP) – Wood Furniture Manufacturing Operations
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 68	Chemical Accident Prevention Provisions
40 CFR Part 70	Federally Mandated Operating Permits
40 CFR Part 82	Protection of Stratospheric Ozone

PROPOSED