



**SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 1 of 6  
A/Ns 501919-20  
Processed by WW  
Reviewed by SMKE  
Date 3/16/2010

**PC**

**Replacement – Coating and Laminating System**

**Applicant's Name:** ClosetMaid  
**Facility ID:** 153420  
**Mailing Address:** 5150 Edison Avenue, Chino, CA 91710  
**Equipment Address:** 5150 Edison Avenue, Chino, CA 91710

**EQUIPMENT DESCRIPTION**

**A/N 501920**

Title V – Deminimus Permit Revision

**A/N 501919**

*Replacement of A/N 474607, PO F95712*

***CONVERYORIZED COATING AND LAMINATING SYSTEM CONSISTING OF:***

- 1. BOARD COATER, HARLAN, WITH TWO ROLLERS, TOP AND BOTTOM, EACH 5'-6" L. X 0'-10" DIA.***
- 2. WEB COATER, HARLAN, WITH TWO ROLLERS, TOP AND BOTTOM, EACH 5'-7" L. X 0'-9" DIA.***
- 3. LAMINATOR, HARLAN, WITH TWO SILICON TOP AND BOTTOM ROLLERS AND FOUR STEEL NIP ROLLERS, TWO ON TOP AND TWO ON BOTTOM.***

**Conditions Spray Booth:**

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.**
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.**



**SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION  
Coating, Printing, Aerospace & Metal Finishing Team  
PERMIT APPLICATION EVALUATION**

Page 2 of 6  
A/Ns 501919-20  
Processed by WW  
Reviewed by SMKE  
Date 3/16/2010

3. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THIS FACILITY SHALL NOT EXCEED 339 POUNDS IN ANY ONE DAY. (FAC CONDITION)
4. THE TOTAL QUANTITY OF VOC EMISSIONS FROM THIS EQUIPMENT SHALL NOT EXCEED 30 POUNDS IN ANY.
5. THIS EQUIPMENT SHALL BE OPERATED IN COMPLIANCE WITH RULES 1168 AND 1171.
6. IN ADDITION TO RECORD KEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY VOC EMISSIONS IN POUNDS AND THE VOC CONTENT OF EACH MATERIAL AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS). ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE.
7. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF DECEMBER 7, 1990 OR EARLIER.

### **BACKGROUND**

Application no. 501919 for a new laminating system was submitted on 8/27/09 to replace an existing laminating system permitted under P/O F95712 (A/N 474607). The laminating system to be replaced has a 30 lb/day VOC on the current permit. The new equipment will operate under the same equipment cap. This meets the requirements for functionally identical replacement under Rule 1304. The facility will retain the existing facility VOC limit of 339 lbs/day (facility condition). Therefore this project will not result in an increase in facility emissions.

ClosetMaid is a Title V facility. A Title V permit revision application No. 501920 was also submitted with this application. There was a change of operator for all the permitted equipment under the previous operator, Do+Able Products, Inc. (ID# 95908). The first Title V permit for ClosetMaid was issued on March 6, 2008. The Title V renewal for Do+Able Products was issued on 5/6/07. The proposed project is considered as a "minor permit revision" to the Title V renewal permit, as described in Regulation XXX evaluation.

### **PROCESS DESCRIPTION**



**SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION  
Coating, Printing, Aerospace & Metal Finishing Team  
PERMIT APPLICATION EVALUATION**

Page 3 of 6  
A/Ns 501919-20  
Processed by WW  
Reviewed by SMKE  
Date 3/16/2010

ClosetMaid manufactures medium density fiberboard (MDF) cabinets and storage containers for the retail market. ClosetMaid purchases MDF panels in both 5/8" and 3/4" thickness from an off-site vendor. Once the MDF panels are at the facility, they are cut down to various sizes depending on the product being made. These cut down MDF boards are then sent to the laminating system where the adhesive is laid onto the MDF via rollers and a laminate is applied. This is a conveyORIZED/continuous operation.

### EMISSION CALCULATIONS

The new laminating system will have the same emissions (30 lb/day VOC equipment limit) as the replaced equipment therefore there is no emission increase. The facility is operating under a facility-wide VOC emission limit of 339 lbs/day.

Operating schedule: 16 hrs/day, 5 days/wk, 52 wks/yr (maximum)  
AEIS & NSR VOC = 30 lb/day ÷ 16 hr/day = 1.9 lb/hr (R1 & R2)  
30 day average entry = 0 (bubble)

### RULE EVALUATION

**RULE 212(c)(1)** *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Since there are no schools within 1,000 feet of the facility, a public notice will not be required by this section.

**RULE 212(c)(2)&(g)** *This section requires a public notice for all new and modified facilities which have on-site emission increases exceeding any of the daily maximums specified in subdivision (g).*

This is a functionally identical replacement. The new laminating system VOC emissions will be the same as the previous equipment, and will be limited to 30 lb/day VOC as on the previous permit. The facility will retain the existing VOC facility limit of 339 lbs/day. Therefore, there will be no emission increase from this facility due to this project. Public notice is not required.

**RULE 212(c)(3)** *This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of*



**SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION  
Coating, Printing, Aerospace & Metal Finishing Team  
PERMIT APPLICATION EVALUATION**

Page 4 of 6  
A/Ns 501919-20  
Processed by WW  
Reviewed by SMKE  
Date 3/16/2010

*Rule 1401 resulted in MICR greater than  $1E^{-6}$  per permit unit or greater than  $10E^{-6}$  per facility.*

The laminating system is a replacement unit and the emissions calculated of TAC listed in Rule 1401 with an effective date of 6/5/09 or earlier from the use of adhesives (contain vinyl acetate) resulted in HIC below one. The proposed project is expected to comply with all applicable R1401 requirements. Public notice will not be required per this section.

**RULE 401**

Visible Emissions

Visible emissions are not expected with proper maintenance and operation of this equipment. The system shows no visible emissions complaints at this location.

**RULE 402**

Nuisance

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. The system shows no nuisance complaints at this location.

**RULE 1168**

Adhesive Application

<b>Coating</b>	<b>Rule 1168 VOC Limit</b>	<b>Actual VOC Content</b>
General	100 g/l (0.83 lb/gal) of coating	0 – 0.03 lb/gal of coating

**RULE 1171**

Solvent Cleaning Operations

They use hot water for clean up. Compliance is expected.

**REG XIII**

Rule 1303(a), Best Available Control Technology (BACT)

BACT is met by use of low VOC adhesives. In addition, the equipment will be limited to 30 lbs/day same as previous equipment. BACT for a rollercoater is compliance with Reg XI if < 36 lb/day VOC.

 <p><b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b> ENGINEERING AND COMPLIANCE DIVISION <i>Coating, Printing, Aerospace &amp; Metal Finishing Team</i> <b>PERMIT APPLICATION EVALUATION</b></p>	Page 5 of 6 A/Ns 501919-20 Processed by WW Reviewed by SMKE Date 3/16/2010
---	--

Rule 1303 (b)(1), Modeling

Modeling is not required for VOC.

Rule 1304 (c)(1), Offsets Exemption

Offsets are not required since there is no emission increase from the facility. This is a functionally identical replacement that will be limited to the same equipment and facility VOC cap. This meets the offset exemption of Rule 1304(a)(1); therefore offsets are not required for this project.

**RULE 1401**

New Source Review of Toxic air Contaminants

The adhesives used in the laminating system contain vinyl acetate which is a chronic TAC listed in this rule. The HIC is below 1 as shown on the attached spreadsheet. However, this is a functionally identical replacement that meets the exemption criteria of Rule 1401(g)(1)(C), so it is exempt from the requirements of this rule.

Materials	Usage gal/day	VOC lb/gal	Emissions VOC lb/day	Density lb/gal	Toxic Cpd.	Toxic Wt %	Toxic Emissions	
							lb/day	lb/hr
Adhesive	900	0.0333	30	9.1	Vinyl acetate	45.0%	3685.5	153.6

**REG XXX**

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project is the 2nd permit revision to the initial Title V permit issued to the previous owner on March 6, 2008. The following table summarizes the permit revisions since the Initial Title V was issued.



**SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT  
ENGINEERING AND COMPLIANCE DIVISION**

**Coating, Printing, Aerospace & Metal Finishing Team**

**PERMIT APPLICATION EVALUATION**

Page 6 of 6  
A/Ns 501919-20  
Processed by WW  
Reviewed by SMKE  
Date 3/16/2010

<i>Revision</i>	<i>HAP</i>	<i>VOC</i>	<i>NOx</i>	<i>PM<sub>10</sub></i>	<i>SOx</i>	<i>CO</i>
1 <sup>st</sup> Revision: Add new laminating system (A/N 501919) to replace existing laminating system (A/N 474607, P/O F95712) P/C	0	0	0	0	0	0
Revision 0 (administrative): change of operator from Do+Able Pdts (ID# 95908) to ClosetMaid (ID# 153420) issued 3/6/08 (Revision 0).	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily Limit	30	30	40	30	60	220

**RECOMMENDATION**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.