



DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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FINAL ACTION REPORT PART 70 OPERATING PERMIT

Capital Cabinets, a Division of MasterBrand Cabinets
Source: 482

Public Notice: Review-Journal July 5, 2009
Public Comments: July 6, 2009 to August 4, 2009

Comments Received: Capital Cabinets, Inc., a Division of MasterBrand Cabinets

Public Hearings: No public hearing was held.

Issuance date: November 3, 2009
Expiration date: November 2, 2014

Copies of comments received and responses to those comments are part of this final action report. All responders shall receive an electronic copy of this report, the final Part 70 OP (Title V), and the final TSD.

COMMENTS RECEIVED FROM CAPITAL CABINETS AND DAQEM RESPONSE

DAQEM received comments for the source on July 14, 2009 and the relevant parts of the comments are provided below:

Comments on Draft Part 70 Operating Permit.

II. General Conditions

A.7. Please delete this section in its entirety since the referenced citation relates to the requirements for a "complete application" under AQR 19.1.2 and is not relevant to an Operating Permit.

DAQEM Response:

The citation for A. 7 is correct and therefore, no change to the condition is made.

IV. Emission Units and Applicable Requirements

Section IV.B. Emission Limitations and Standards

Table IV-B-1

DAQEM Response:

Due to the change of permit formatting, the above referenced Section IV became Section III in the final Operating Permit. The requested corrections to Table IV-B-1 have been made.

B.1.7. Please change the regulatory citation from (CFR 63.802) to (ATC Modification 8 Condition IV.B.7).

DAQEM Response:

Please note that the authority of Section III-B is the NSR ATC/OP modification 8 and 9 as described in the beginning of Section III-B. Citation to Condition B.1.7 has been removed as requested.

B.2.1. Change “(EU: A01 through A15)” to “(EU: A02 and A06-A14)”.

DAQEM Response:

The condition has been changed as requested.

B.3.15. To be consistent with ATC Modification 9, change this condition to read as:

“Unpaved parking lots, material handling and storage areas, and equipment storage yards on the site shall be stabilized by applying surface gravel or dust palliatives so not to exhibit opacity greater than the 20 percent.”

DAQEM Response:

The permit condition was revised to incorporate enforceability in accordance with the requirements of AQR 19 and reads:

Unpaved Parking

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)]

Section IV.C. Monitoring

C.2 and C.3. Please revise quarterly reporting to semi-annual reporting as required in 40CFR 63.804. The Part 70 Permit requires CC to submit quarterly reports to DAQEM as identified in IV.F.2, 40CFR 63.804 only requires the “Continuous Compliance Status Report” to be submitted semi-annually.

DAQEM Response:

DAQEM is aware of the semi-annual reporting requirement in the 40 CFR 63.804, however, local AQR Section 19, requires quarterly reporting in the Part 70 OP. The quarterly reporting requirement will be maintained in the permit as the most stringent requirement of the two.

Section IV.F. Reporting

Item F.5. Please revise the condition as follows by inserting the underlined **bold** wording below:

“Each annual performance test (**if required by Control Officer**) shall:”

DAQEM Response:

The reporting section of the Part 70 Operating Permits has been revised and updated. The new reporting conditions are modified to address all performance test reporting requirements in general. The permittee shall follow the performance testing requirements as per CFR 63.805 or more often if required by the Control Officer.

Comments on Part 70 Technical Support Document.

Executive Summary

Please revise the text as follows by inserting the underlined bold wording below:

Capital Cabinets a Division of MasterBrand Cabinets (CC) (**formerly Capital Cabinet Corporation**).

DAQEM Response:

The revision has been implemented as requested.

Section D. Operating Scenario

Capital Cabinets is submitting a revised process flow diagram for use a Figure II-D-1.

DAQEM Response:

The process flow diagram has been updated as requested.

All the corrections/changes mentioned in the comments above have been incorporated in the final Part 70 OP.

There were no other comments from the public or from EPA Region 9.