

RESPONSIVENESS SUMMARY

for

Woodcase Fine Cabinetry, Inc.

December 23, 2004

USEPA, Region IX Comments

Note: The comments below reference draft comments submitted by US EPA to Maricopa County Environmental Services Department (MCESD) in a July 30 email. For your reference, these comments are attached on the following page.

Comment #1.

In draft comment #3 EPA requested that MCESD include a 99.5% control efficiency requirement in Woodcase's permit for the baghouse, or, alternatively, to allow the source to determine a different control efficiency that would demonstrate compliance during a source test. The proposed permit issued for EPA review on November 15, 2004 has the following condition (19.C.2):

“The Permittee shall operate and maintain each baghouse with a removal efficiency of 99.5 % for particulate matter with an aerodynamic diameter of 100 microns or less or, if this efficiency is not demonstrated during the emission tests required by these Permit Conditions, the Permittee may demonstrate compliance with Rule 311 using the emission rates from the baghouses as determined by the testing required by these permit conditions.”

We intended for the permit to specify one or the other. The permit should specify exactly how the source will demonstrate compliance with all applicable requirements, in this case Rule 311. Therefore, the permit should either state: “The Permittee shall operate and maintain each baghouse with a removal efficiency of 99.5 % for particulate matter with an aerodynamic diameter of 100 microns or less” *or* “The permittee shall determine an appropriate control efficiency that demonstrates compliance with Rule 311 during an initial source test.”

Response #1.

The 99.5% control efficiency was specified in the Woodcase permit application. The permit condition requires testing to determine compliance with either the control efficiency or Maricopa County Air Quality Department (MCAQD) Rule 311. Compliance with the control efficiency is more stringent than MCAQD Rule 311, and therefore is included as a result of the permit application. The permit language will not be changed.

Comment #2.

In draft comment #4 EPA requested that the requirements of SIP Rule 311, section 502.3 be included in the permit. This requirement still appears to be missing; please add it to the permit.

Response #2.

The requirements of SIP Rule 311, section 502.3 will be included in the permit. The requirements will be inserted into Permit Condition 20.B.1).

Comment #3.

Draft comment #5 discusses the pressure differential range included in the permit for the baghouse. We are concerned that this range may be too broad to detect problems with the baghouse that may affect control efficiency. The TSD should discuss how Woodcase and MCESD determined the appropriate range. In the absence of any correlating data, the permit should require source tests to determine the appropriate range.

Response #3.

The differential pressure range included in the permit for the baghouse is 0.5-6 inches of water column. The range was proposed by Woodcase in the Operation and Maintenance (O&M) Plan. The magnehelic gauge range is from 0 to 8 inches of water column. MCAQD believes the operating range provided is acceptable based on similarly operating baghouses. In addition, MCAQD has provided a means to evaluate the differential pressure range in Permit condition 20.B.11):

“The Permittee shall submit within three months of the permit's issue date, recordkeeping data of the differential pressure readings from each baghouse to support the differential pressure range in permit condition [20.B.9], of .5 to 6.0 inches of water. Records submitted shall be from the previous two-year period. The Permittee shall submit at minimum, ten separate calendar day records for each baghouse.”

The differential pressure range will not be modified in the permit.

Comment #4.

In draft comment #8.a, EPA requested that MCESD remove the option under permit condition 20.A.1.a allowing Woodcase to track VOC emissions using purchase records and to require instead that the Permittee track actual usage under all circumstances. No change was made to the permit in response to this comment. Allowing the source to use monthly purchase records does nothing to demonstrate compliance with the facility-wide monthly VOC emission limit of 10 tons/month. For instance, say the first month of permit issuance the source purchases 10 tons of VOC containing material, but only uses 4

tons. That first month the emissions records would show that the source had used and emitted 10 tons, but the source would actually have 6 tons leftover from actual usage that the source could use at a later time. Say the same thing happens the second month, where the source purchases 10 tons of material, but only uses 4 tons. The source would then have 12 extra tons to use at a later date. The next month the source purchases 8 tons, and actually uses those 8 tons, plus the stockpiled 12 tons from the two previous months. The source would report 8 tons of emissions, but the actual emissions would be 20 tons, double the monthly limit. From a public health standpoint it is important that large amounts of VOCs are not emitted over a short time period. Please remove this option from the permit, and replace it with a requirement to track actual usage of VOC containing material.

Response #4.

The permit language will be modified to require VOC emissions to be determined based on usage records rather than purchase records. Permit condition 20.A.1)(a) and (b) will be modified in response to this EPA comment.

Comment #5.

In draft comment #8.c EPA requested that the permit require Woodcase to use guaranteed product specification sheets supplied by the manufacturer rather than MSDS to determine VOC emissions. Condition 20.A.1 still allows the source to use MSDS to show compliance. Please change the permit in accordance with draft comment #8.c.

Response #5.

The permit will be modified to require the Permittee to maintain documentation of the VOC content of all VOC containing materials used in the woodworking process in a guaranteed product specification sheet supplied by the manufacturer. These product specification sheets will be used to determine VOC emissions.

