

United States Environmental Protection Agency
Region 5
Air Programs Branch
Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

CONSTRUCTION PERMIT
WITH SYNTHETIC MINOR LIMIT
Draft

Permit Number: SYN-ON-55009R0004-2014-01

Issue Date:

Effective Date:

In accordance with the provisions of the Clean Air Act and 40 C.F.R. Part 49:

Prestige Custom Cabinetry & Millwork, Inc.

is authorized to construct and operate air emissions units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to construct and operate in the following location:

**476 Packerland Drive
Green Bay, Wisconsin 54303**

Prestige Custom Cabinetry & Millwork, Inc. is located on trust lands within the exterior boundary of the Oneida Nation of Wisconsin's reservation.

Terms and conditions not otherwise defined in this permit have the meaning assigned to them in 40 C.F.R. Part 49. All terms and conditions of the permit are enforceable by EPA and citizens under the Clean Air Act.



Susan Hedman
Regional Administrator
U.S. EPA, Region 5

10-15-2014
Date

Abbreviations and Acronyms

BTU	British thermal unit
CAA	Clean Air Act
CO	Carbon Monoxide
EPA	U.S. Environmental Protection Agency
Facility	Prestige Custom Cabinetry Inc.
HAP	Hazardous Air Pollutant
hr	Hour
HVLP	High volume low pressure
lb	Pound
lbs/hr	Pounds per hour
lbs/month	Pounds per month
MMBTU	Millions of BTUs
NOx	Nitrogen Oxides
NSR	New Source Review
Permittee	Prestige Custom Cabinetry Inc.
PM	Particulate Matter
PM10	Particulate Matter smaller than 10 microns
PM2.5	Particulate Matter smaller than 2.5 microns
SO2	Sulfur Dioxide
TPY	Tons per year
VOC	Volatile Organic Compound

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Prestige Custom Cabinetry, Inc.
Permit No.

1.0 FACILITY DESCRIPTION

(A). General Source Information

Owner: Mike Mashl, President
Prestige Custom Cabinetry & Millwork, Inc.
476 Packerland Drive
Green Bay, Wisconsin 54303

Facility: Prestige Custom Cabinetry & Millwork, Inc.
476 Packerland Drive
Green Bay, Wisconsin 544303

County: Brown

Reservation: Oneida Nation of Wisconsin

Facility Contact: Mike Mashl, President
Telephone: (920) 965-1919
SIC Code: 2234
NAICS Code: 33711

This permit authorizes the construction of a custom cabinetry fabrication and finishing operation. This permit also provides a mechanism for Prestige Custom Cabinetry & Millwork, Inc. (Prestige or the permittee) to voluntarily accept restrictions on the potential to emit for its facility at 476 Packerland Drive, Green Bay, Wisconsin (Facility) to become a synthetic minor Hazardous Air Pollutants (HAP) source, and sets forth enforceable restrictions for operating the Facility.

(B) Emission Unit Descriptions

Prestige manufactures custom wooden cabinetry. The process includes cutting, sanding, routing various hard and soft woods for construction of cabinetry (unit P04). All particulate matter generated from the manufacturing process is controlled by a baghouse (unit C04) which is then vented to the atmosphere through a stack (unit S04). Cabinet components are assembled using mechanical fasteners and no volatile organic compound (VOC) containing adhesives. There are three spray booths (units P01, P02, and P03B) at the facility, where Prestige applies solvent and water based stains, paints, topcoats, and sealers to wood cabinets. The stains are generally applied by hand using rags. All other coatings are applied using high volume low pressure (HVLP) spray guns. The particulate matter from overspray is controlled with wall panel filters (units C01, C02, and C03B) and then vented to three stacks (units S01, S02, and S03B), one for each spray booth. The coated parts are then transferred to a dry-off oven (P05) with a maximum hourly capacity rating of 150,000 BTUs.

2.0 UNIT AND FACILITY SPECIFIC REQUIREMENTS:

(A) Emission Limitations and Standards

The permittee shall comply with the following requirements at the Facility as set forth in Section 2(A) of this permit:

1. Limitations and Requirements

a. Facility wide synthetic minor limitations:

i. VOCs:

- A. The permittee shall not emit more than 45 tpy on a 12 month rolling average; and
- B. The permittee shall not emit more than 3.71 tons/month on a 30 day rolling average.

ii. HAPs:

- A. The permittee shall not emit more than 9.9 tpy of any single HAP, 1,666 lbs/month average (30 day rolling average).
- B. The permittee shall not emit more than 24.9 tpy of combined HAPs, 4,166 lbs/month average (30 day rolling average).

b. Unit specific limitations:

- i. The permittee shall not emit more than 0.90 lbs/hour PM from units in Process P04.
- ii. The permittee shall not emit more than 0.25 lbs/hour PM from units in Process P01.
- iii. The permittee shall not emit more than 0.25 lbs/hour PM from units in Process P02.
- iv. The permittee shall not emit more than 0.25 lbs/hour PM from units in Process P03B.

2. Operating Requirements

The permittee shall use HVLP spray guns and control overspray with wall panel filters rated at a minimum control efficiency of 98 percent. Particulate matter emissions from the woodworking process are to be controlled with the use of the baghouse.

3. Good Air Pollution Control Practice

At all times, including start-up, shut-down, and malfunction, the permittee shall, to the extent practicable, maintain and operate all sources including associated air pollution control equipment regulated by this permit in a manner consistent with good air pollution control practice for minimizing emissions. The determination of whether acceptable operating and maintenance practices are being used will be made by EPA based on information that is available to EPA. This may include,

but is not limited to, monitoring results, review of operating and maintenance procedures, and inspections of the Facility.

(B). Monitoring and Testing

1. Monitoring

The permittee shall inspect the wall panel filters for the spray booths daily for proper fit, placement and condition.

The permittee shall inspect the magnehelic gauge readings of the baghouse for the wood working process once per 8 hours of operation.

The permittee shall inspect the baghouse daily for proper operation and condition of the bags.

2. Performance Testing

a. Representative Testing Conditions. Performance tests shall be conducted under such conditions as EPA shall specify to the Facility operator based on representative performance of the affected Facility. The permittee shall make available to EPA such records as may be necessary for EPA to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

b. Operating Conditions for Performance Testing. All performance tests shall be conducted at worst-case operating (non-malfunction) conditions for all emission units for each air pollutant.

c. Failure to Demonstrate Compliance. Upon EPA's written notice that the Facility has failed to demonstrate compliance with an applicable emission limit, and unless an alternative schedule is given in an applicable requirement or compliance document, the permittee shall:

1. Conduct a retest within 30 days of receipt of the EPA written notice;
2. Within 14 days, submit to EPA written notice of testing and submit a test plan for the retest; and
3. Submit a complete report of the results of the retest within 45 days after completion.

- d. Agency Tests. Upon request of EPA, the permittee shall allow EPA, or any authorized employee or agent of EPA, to enter upon the premises for the purposes of conducting performance tests or inspections. The permittee shall provide performance testing facilities that enable EPA to conduct performance tests, including:
 1. Sampling ports adequate for the applicable test methods;
 2. Safe sampling platforms;
 3. Safe access to sampling platforms; and
 4. Utilities for sampling and testing equipment.

(C). Recordkeeping and Reporting

1. Recordkeeping
 - a. The permittee shall maintain at the Facility a file containing the records specified below. The permittee shall retain all records at the Facility location for at least five years following the creation of such records. Records which must be retained at this location include all calibration and maintenance records, all original recording for continuous monitoring instrumentation, and copies of all reports required by this permit. Records of all monitoring required by this permit and information about monitoring include, but are not limited to:
 - i. The permittee shall track of product usage of stains, sealers, topcoat, and paint, to determine in tons per month and tpy the VOC emissions from the Facility.
 - ii. The permittee shall, on a monthly basis, determine in units of pounds per month the Facility's monthly HAP emissions, and the most recent 12-month average monthly emission of each single HAP emitted. The permittee shall, on a monthly basis, record in units of pounds per month the Facility's total monthly emissions and most recent 12-month average monthly emission of all HAPs emitted. The permittee will track monthly usage of product to determine HAP emissions.
 - iii. The permittee shall determine each month the emission of each single HAP and the total emission of all HAPs emitted, using the following method. In the first month after the issuance of this permit, the average monthly emissions for each single HAP, and the average monthly HAP emissions (individual and total) shall be the actual HAP emissions for that month. After the second month, the average monthly emissions for each single HAP and for all HAPs shall be determined by the total from the previous two months emissions, divided by two. After the third month, HAP emissions shall be determined by the total from the previous three

months, divided by three. This averaging procedure shall be followed for each subsequent month through the 12th month.

From the 13th month after the issuance of this permit and beyond, for the average monthly emissions for each single HAP and for all HAPs, the permittee shall determine the average monthly HAP emission rate (individual and total) by adding the total from the previous 12 consecutive months and dividing the total by 12.

- iv. The permittee shall, on a monthly basis, determine the Facility's monthly emission and month recent 12-month average monthly emissions of PM emitted in units of pounds per month and tpy respectively.
- v. The facility shall maintain records of the daily wall filter and baghouse inspections.
- vi. The permittee shall track the product usage of all stains, sealers, paints, topcoats, lacquer thinner, and cleaning solvents on a daily basis and calculate the monthly average VOC and HAP emissions in tons/month and 12 month rolling average VOC and HAP emissions in tpy. The calculation for VOC and HAP emissions is based on 100% of the VOC and HAP content of the product usage is being emitted, and there is no retention of VOC or HAPs on the final product.
- vii. The permittee shall record magnehelic gauge readings of the baghouse once per 8 hours of operation and the daily baghouse inspections.

2. Reporting

The permittee shall report to EPA any deviation from any permit requirements, including those attributable to upset conditions the probable cause of such deviation and any corrective actions or preventative measures taken within 30 days of the deviation.

3.0 FACILITY-WIDE REQUIREMENTS

(A). Notification

1. Testing Notification. Written notification of the planned test date shall be received by EPA at least 30 days before the planned test date. EPA shall reject the results of a test if the permittee gives less than 30 days notice unless EPA has given written authorization of a shorter notice. If after 30 days notice for a scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the permittee shall notify EPA as soon as possible, either by providing at least 7 days prior notice of the rescheduled

performance test date, or by arranging a rescheduled date by mutual agreement with EPA.

2. Approval of Test Plan. The permittee shall submit to EPA a test plan in advance of the test notification required under this section. If the proposed test plan does not contain sufficient or accurate enough detail to ensure that the performance test meets the requirements of the applicable requirement or compliance document, EPA may reject the test plan, and the permittee must address all of EPA's comments on revisions and additions that are necessary to make the plan complete.

(B). Recordkeeping and Reporting

1. The permittee shall maintain in a permanent form suitable for inspection for five years at the Facility at which the permitted units are located, a file of all measurements, including those from: monitoring devices and performance testing; adjustment and maintenance performed on these systems or devices; and all other information required by this permit.
2. Within 45 days after completion of a performance test, the permittee shall submit a copy of the results to EPA.

4.0 GENERAL PERMIT CONDITIONS

(A). Definitions

Terms and conditions in this permit have the meaning assigned to them in 40 C.F.R. § 49.152 unless other regulations or statutes are referenced or applicable.

(B). Issuance and effective date of Permit

This permit shall become effective on the date of signature by the Regional Administrator.

(C). Construction without a Permit

If the permittee constructs or operates any source or modification not in accordance with the terms of any approval to construct or operate, the permittee shall be subject to appropriate enforcement action.

(D). Construction Approval

1. Nothing in this permit shall alter the requirement for the permittee to obtain a construction permit before commencement of construction of a new emissions unit or modification of an existing emission unit.

2. Approval for construction or installation shall not relieve the permittee of the responsibility to comply fully with applicable provisions of any other requirements of federal law or regulation.

(E). Compliance with Permit Requirements

1. The permittee must comply with each permit term and condition set forth herein. Failure to comply with the terms and conditions of this permit constitutes a violation of the permit, may constitute a violation of the Clean Air Act (CAA), and is grounds for:
 - a. An enforcement action under Section 113 of the CAA;
 - b. Termination, revocation and reissuance, or modification of the permit; or
 - c. Denial of a federal operating permit application under 40 C.F.R. Part 71.
2. It is not a defense in an enforcement action for violation of this permit that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(F). Prohibition on Violation of NAAQS and PSD Increment

The emission units that are the subject of this permit must not cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS) or to a violation of a Prevention of Significant Deterioration (PSD) increment.

(G). Submittals

1. Unless otherwise directed by EPA or this permit, the permittee shall submit a copy of all test plans, reports, certifications, notifications, and other information pertaining to compliance with this permit to:

Air Enforcement and Compliance Assurance Branch (AE-17J)
Air and Radiation Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

2. The permittee shall submit permit applications, applications for permit amendments, and other applicable permit information, which includes but is not limited to installation of control equipment, replacement of an emissions unit, and requests for changes that contravene current permit terms, to:

Air Permits Section
Air Programs Branch (AR-18J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

(H). Severability

The terms and conditions in this permit are distinct and severable. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of this permit. If any term or condition in this permit is held invalid, such invalidity shall not affect the validity or application of other terms or conditions.

(I). Permit Revision, Reopening, Revocation and Reissuance, and Termination

This permit shall remain in effect, unless and until EPA revises, reopens, revokes and reissues or terminates it for cause. The permittee may request that EPA revise, reopen, revoke and reissue or terminate this permit or a particular portion of this permit; however, such a request does not stay any permit condition. The permittee shall furnish to EPA, within a reasonable time, any information EPA requests in writing to determine whether cause exists for revising, revoking and reissuing or terminating the permit or to determine compliance with the permit. For any such information claimed to be confidential, the permittee also must submit a claim of confidentiality in accordance with 40 C.F.R. Part 2 at the time of submission of the information.

If EPA rescinds this permit, or any portion of this permit, the public shall be given adequate notice of the rescission. Publication of an announcement of rescission shall be given in a newspaper of general circulation in the affected region within 60 days of the rescission.

(J). Entry and Inspection

The permittee shall allow EPA authorized representatives, upon presentation of credentials, to:

1. Have a right of entry to, upon, or through any premises where a source subject to this permit is located or where records required by this permit are kept;
2. At reasonable times, have access to any records required by this permit and to make copies of any records;

3. Inspect the emissions units that are the subject of the this permit and any monitoring equipment and method required by or referenced in this permit; and
4. Sample any emissions to assure compliance with this permit or other applicable requirements.

(K). Circumvention

The permittee shall not build, erect, install or use any article, machine, equipment or process, the use of which conceals any emission which would otherwise constitute a violation of an applicable standard.

This permit does not convey any property rights of any sort or any exclusive privilege.