

TECHNICAL SUPPORT DOCUMENT

TECHNICAL INFORMATION PRESENTED IN REVIEW OF AN
APPLICATION FOR A PART 70 OPERATING PERMIT

SUBMITTED BY

Environmental Resources Management, Inc.
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for

Capital Cabinets, a Division of MasterBrand Cabinets

Part 70 Operating Permit Source: 482
SIC Code - 2434: Wood Kitchen Cabinets



Clark County
Department of Air Quality and Environmental Management
Permitting Section

June 2009

EXECUTIVE SUMMARY

The Capital Cabinets, a Division of MasterBrand Cabinets (CC) is a synthetic minor source in terms of the PTE. However, the source is subject to 40 CFR 63, Subpart JJ and it is a Title V source. 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.

CC manufactures kitchen cabinets and counter tops. Raw materials (wood) received by CC are processed to build cabinets. Wood processing includes cutting and sanding operations. Various coatings and paints are applied to the wood cabinets prior to shipment. These coatings include sealers, topcoat, stains and paints. Contact cement is used for the production of counter tops. The source is under Standard Industrial Classification (SIC) code 2434 – Wood Kitchen Cabinets and North American Industry Classification System (NAICS) code 81121 - Wood Kitchen Cabinet and Countertop Manufacturing.

The potential emissions for the source are shown in the table below.

Table I-1: Maximum Source PTE (tons per year)

PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
8.41	3.36	2.82	0.03	25.18	24.43

The source applied for initial Part 70 Operating Permit on March 5, 1996 and revised the application on August 8, 1996. On December 18, 1998 the Health District requested additional information from the source and the CC re-submitted Part 70 OP application on April 30, 1999, the re-submitted application was revised on June 11, 1999. A Notice of Violation (NOV) was issued by the US EPA to CC in July 2000. EPA alleged that the ATC/OP issued on June 23, 1999 was deficient, because of inadequate notice for public review and lack of BACT/LAER analysis considering CC a new source. On November 10, 2003, the United States Department of Justice and CC entered into a consent decree resolving EPA's allegations against CC.

On March 30, 2005 the source submitted new Part 70 OP application that incorporated conditions of the consent decree with the US EPA. On March 2, 2009, the source submitted an application for a modification the existing NSR permit and asked for the update of the Part 70 OP application. Based on the information submitted by the applicant and a technical review performed by the DAQEM staff, the DAQEM proposes the issuance of a Part 70 Operating Permit to Capital Cabinets, a Division of MasterBrand Cabinets.

This Technical Support Document (TSD) accompanies the proposed Part 70 Operating Permit for Capital Cabinets, a Division of MasterBrand Cabinets.

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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. SOURCE INFORMATION

A. General

Permittee	Capital Cabinets, a Division of MasterBrand Cabinets
Mailing Address	3645 Losee Road, North Las Vegas, NV 89030
Contacts	Lance Knotts, Manufacturing Manager of Nevada Operations
Phone Number	(702) 649-8733
Fax Number	(702) 649-6512
Source Location	3645 Losee Road, North Las Vegas, NV 89030
Hydrographic Area	212
Township, Range, Section	T20S, R61E, Section 11
SIC Code	2434 - Wood Kitchen Cabinets
NAICS Code	337110 - Wood Kitchen Cabinet and Countertop Manufacturing

B. Description of Process

The Capital Cabinets, a Division of MasterBrand Cabinets (CC) manufactures wood kitchen and bathroom cabinets. Particle board and solid wood are cut and sanded. The cabinets are sanded, stained, sprayed with a sealer coat and then finished with a top coat. CC also manufactures counter tops using high-pressure laminates, particle board, solid wood, and contact cement. Spray coating with stain, sealer, topcoat, paint, and application of adhesives are the main sources of VOC emissions, including HAPs. Cutting and sanding of wood results in PM₁₀ emissions.

C. Permitting History

Clark County issued the original operating permit for Capital Cabinets (CC) in 1983 based on the local air quality regulations effective at that time. The VOC emissions in the original permit application were estimated at 17 tons per year, less than the 40 ton-per-year threshold for the applicability of LAER and offset requirements. Modifications to the permit were made in 1984, 1989 and 1993. The 1984 modification included construction of a contact cement spray booth. In 1989, the facility's VOC emissions were determined to be 75.26 tons per year. This increase in the emissions limit was, at that time, considered within the growth allowance as per Section 12.2.3.3, adopted June 25, 1987. According to AQR Section 12.2.3.1, the facility was subject to LAER. With this permitting action, DAQEM determined that the facility was subject to BACT.

The permit conditions limited the annual usage of chemicals as follows:

Lacquer:	7,500 gallons
Stain:	6,000 gallons
Sealer:	13,000 gallons

Contact Cement: 330 gallons

No usage limit for thinner was specified in the permit.

In 1993, the 1989 permit was superseded by the issuance of the Operating Permit. The VOC emission limit was maintained at 75.26 tons per year. The VOC content of the chemicals used at the facility was limited as follows:

Stain:	6.00 lbs/gallon
Lacquer:	5.50 lbs/gallon
Sealer:	5.50 lbs/gallon
Contact Cement:	5.35 lbs/gallon
Thinner:	7.19 lbs/gallon

The actual emissions reported for 1993 were 55 tons of VOC. A Part 70 application was submitted in February 1996. Since the 1993 operating permit lacked enforceable conditions, it was stated by the Air Pollution Control District (APCD), the predecessor of DAQEM that CC must apply for an Authority to Construct (ATC) Permit. A letter from EPA dated April 27, 1998 to the District recommended that the new ATC be written in accordance with the current regulations (Section 12) and, therefore, LAER and offset requirements were applicable to CC, at that time. In the letter from December 21, 1998, the APDC recommended that CC applied for an ATC to resolve the immediate permitting issues such as lack of short-term emission limits and to continue research and document low-VOC containing materials. The letter also stated that CC should re-evaluate BACT/LAER either at the time of an expansion of the facility or within a specified time period.

In March 12, 1999, the District received an application for an ATC (Modification 2). There was no physical or operational change at the facility associated with this modification. The changes proposed by CC would further limit the monthly VOC and HAP emissions from the facility with no impact on existing permitted annual emissions. The proposed changes, according to CC, would allow the facility to meet the demands of a changing market and to easily track and provide data and information necessary to ensure compliance with terms and conditions of the new permit. No changes were proposed in allowable annual emission limits for VOCs (75.26 tons). The net emissions increase for VOCs was zero. The actual annual emissions had reached 70.7 tons during these past three years.

The maximum monthly and rolling 12-month average enforceable emissions limits proposed in Modification 2 were as follows:

- Maximum VOC emissions of 10 tons per month;
- Rolling 12-month average emissions of 6.3 tons of VOCs per month; and
- Annual VOC emissions of 75.26 tons.

In addition, the following limits for HAPs and PM₁₀ were also proposed:

- Rolling 12-month total emissions of five tons of any HAP per month;
- Annual HAP emissions of 12.5 tons; and
- Annual PM₁₀ emissions of one ton.

On June 23, 1999, ATC/OP Modification 2 was issued. Based on the operating capacity of CC and the existing VOC content limits, the potential to emit was 20 tons of VOCs per month. The following table summarizes the existing and new emission limits based on Modification 2.

Table II-C-1: Modification 2 - Emission Limitations

Pollutant	Mod 2 Limit (tons/month)	Annual Limit Prior to Mod 2 (tons/yr)	Mod 2 Annual Limit (tons/yr)	Other Limits/Comments
VOC	10.0	75.26	75.26	1. Rolling, 12-month average of 6.3 tons. 2. Maximum of 10 tons in one month.
HAP	2.00	None	12.5	Rolling 12-month total of 5 tons of any one HAP.
PM ₁₀	0.14	None	1.0	None

Mr. Robert Hall appealed the issuance of ATC/OP Modification 2 (dated June 23, 1999), to address the appeal the APDC Hearing Board meeting was scheduled on December 9, 1999. A proposed Part 70 operating permit for CC was publicly noticed on August 29, 1999. EPA commented that the proposed Part 70 permit was deficient because the permit did not adequately incorporated all applicable requirements and that problems with the ATC/OP had to be addressed before a Part 70 permit could be issued. The District decided to withdraw the proposed Part 70 permit and reopen the ATC/OP. EPA alleged that the ATC/OP issued on June 23, 1999 was deficient because of inadequate notice for public review and lack of BACT/LAER analysis considering CC a new source.

A Notice of Violation (NOV) was issued by the US EPA to CC in July 2000. The NOV alleged that the facility violated Section 110 of the CAA and the Nevada SIP by failing to obtain a permit meeting the standards for an ATC before commencing construction, failing to incorporate LAER controls; failing to apply BACT; failing to offset NEI of VOCs and failing to obtain a valid operating permit. Additionally, the NOV stated that the facility had been in violation of a NESHAP by failing to comply with Subpart JJ emission limits. The District issued a Corrective Action Order (CAO) to CC on November 3, 1999 requiring CC to submit a LAER analysis. The DAQEM recommended that the ATC/OP be updated in light of the CAO and commentary from EPA.

On December 31, 2000, as a mutually agreed resolution between DAQEM, Mr. Hall and CC, the APCD Hearing Board issued an order in connection with Mr. Hall's appeal. The order required the following:

1. CC shall apply for a new ATC within 45 days of the order;
2. CC shall conduct a technical analysis for controlling VOCs;
3. CC shall include provisions in its application for timely emission reductions;
4. DAQEM staff shall timely prepare conditions to implement emission reduction techniques in accord with the resolution of issues between EPA and CC;
5. DAQEM shall comply with public notice requirements;
6. An approved ATC shall be issued to CC;
7. CC shall submit monthly progress reports to DAQEM; and
8. DAQEM shall submit the monthly reports to the Hearing Board.

CC has completed all of its applicable provisions of the order and on January 8, 2004, the Hearing Board released CC from that order.

On October 23, 2000, APCD received an application for an ATC (Modification 3). The application, however, was deemed incomplete. Thereafter, it was determined that the facility would submit a revised application after the consent decree between CC and the U.S. Department of Justice had been finalized.

An application for an ATC revision (Modification 2, Revision 1) was submitted by CC on December 1, 2000. On January 25, 2001, an administrative revision to the existing permit (Modification 2, Revision 1) was issued to the facility. This revision was required to add an infrared electric oven that

CC needed for its experiments with water-based and ultra-low VOC coating materials. The facility PTE was not affected by this administrative revision of the permit.

An ATC application (Modification 4) was received by DAQEM on October 6, 2003. This modification included the replacement of a baghouse and the addition of two make-up air units and two small furnace units. ATC/OP Modification 4 was issued on December 26, 2003. The facility PTE after the modification was limited to:

Table II-C-2: Source Allowable Emissions (Modification 4)

Pollutant	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Tons/Month	0.24	0.20	0.17	<0.01	10.00	2.00
Tons/Year	2.83	2.38	2.00	0.04	75.40	12.54

On November 10, 2003, the United States Department of Justice and CC entered into a consent decree resolving EPA's allegations against CC. The government alleged that CC:

- (i) constructed and operated its spray booths at its facility in North Las Vegas, Clark County, Nevada (the "Facility"), in violation of the SIP, and that violations of the SIP are continuing;
- (ii) was in violation of the CAA's National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, 40 CFR Part 63, Subpart JJ, 40 CFR 63.800 - 63.808; and
- (iii) has violated section 313 of the Emergency Planning and Community Right-to-Know Act. CC denied these allegations.

In short, CC and EPA resolved these claims as summarized below.

Highlights of the Consent Decree

1. Annual facility-wide VOC emissions shall not exceed 25 tons per rolling 12 months for five years.
2. Monthly facility-wide VOC emissions shall not exceed 3.0 tons per calendar month for five years.
3. Facility-wide VOC means VOCs from wood cabinet coating operations. VOCs from fuel burning emission units or other VOC sources other than wood cabinet coating are not included in the facility VOC cap.
4. The VOC facility cap can be removed in less than five years if a) the facility starts using ultra-low VOC materials for all coating types and b) annual VOC emissions from contact cement is less than 350 pounds per year; or if it is above 350 pounds per year, the VOC content of the contact cement should be less than 0.16 pounds per gallon.
5. CC shall use ultra-low VOC sealers as of the effective date of the consent decree.
6. CC shall comply with the requirements of 40 CFR Part 63, Subpart JJ or an alternative protocol approved by EPA.
7. CC shall maintain weekly record keeping and emission calculations.
8. CC shall report quarterly to EPA.

On December 29, 2003, DAQEM received an application for an Authority to Construct, Modification 5. This application was submitted following the guidelines set out in the consent decree referenced above. The facility proposed the facility-wide VOC limitation of 25 tons per year based on a 12-month rolling average and three tons per calendar month.

On March 23, 2004, DAQEM received an application for an Authority to Construct, Modification 6. This modification proposed to install a monorail consisting of four spray booths, a UV flat line consisting of four spray booths, two parts spray booths and a counter top spray booth. Also proposed in the application were several dust-generating units, a make-up air unit and a small water heater.

On June 4, 2004, CC submitted additional information previously requested by DAQEM. CC also included four new electric heaters and a flash tunnel in the list of new equipment being added to the facility as part of this modification. On July 27, 2007, CC clarified that design changes required the inclusion of six more electric heaters in the final design. These changes included in this modification now bring the total number of electric heaters at the CC facility to eleven. However, electric heaters and the flash tunnel do not generate any pollutant on their own but are included in the permit for informational purposes. On June 28, 2004, CC submitted additional information per DAQEM request. The submittal included a list of primary HAPs expected from the coating operation, the MSDS for the worst-case HAP coatings, and location and stack parameters for the new fuel burning equipment. With this, the application for the ATC was deemed complete.

EPA stated in June 2004 that the consent decree resolved all outstanding issues with CC and the proposed modification should be considered as a modification to an existing major source of VOCs; therefore, this proposed modification application will be reviewed based on the AQR for an existing source in hydrographic area 212.

On March 14, 2008 CC submitted an application for a Modification 8 of the existing ATC/OP. The modification included addition of control conditions for unpaved parking lot and a change of name to Capital Cabinets, a Division of MasterBrand Cabinets. There were no changes in usage of the production coating materials and operating hours. Additionally, the source updated contact information. The permitting action also incorporated previous Modification 7 of the ATC/OP, to increase the annual limit of hazardous air pollutants (HAPs) at the source. The source requested a change in the HAPs limits to allow for production flexibility to change cabinet coatings in order to meet the market needs. The source submitted an operational scenario with supporting documentation that included annual usage of the surface coating materials as well as Material Safety Data Sheets (MSDS). The presented scenario justified the increase in the HAPs emission limit. In addition, the single HAP threshold of 10 tons per year was not exceeded and the source remained non-major for all pollutants. A change in the source HAPs emission limit was compliant with all federal, state, and local requirements as well as with the consent decree. However, the consent decree was terminated on March 18, 2008.

On March 2, 2009, the source submitted an application for a Modification 9 of the existing ATC. The modification included addition of a new bag filter and an increase in size of the unpaved parking (EU: B10). There were no changes in usage of the production coating materials and operating hours for the source.

The CC is a synthetic minor source in terms of the PTE. However, the source is subject to 40 CFR 63, Subpart JJ and it is a Title V source. The compliance date for the existing sources subject to MACT standard that emit less than 50 tons per year of VHAP in 1996 was December 7, 1998. The compliance date for the existing affected sources that emit 50 tons or more of hazardous pollutants in 1996 was November 21, 1997. According to EPA Policy "Once in, Always In" (OIAI) outlined in a U.S. EPA guidance memorandum "Potential to Emit for MACT Standards – Guidance on Timing Issues", dated May 16, 1996, the facility can become an area source by obtaining a federally enforceable permit with synthetic minor limits before the first compliance date of the MACT standard. If the compliance date of the MACT standard passed, the facility must be considered a major source of HAPs due to its PTE, and as such, will be subject to the MACT requirements as a

major source. The facility must comply with the MACT requirements and apply for Title V permit to incorporated MACT requirements. Furthermore, under the applicability of current USEPA MACT policy “once in, always in”, and pending future relaxation of that policy, the facility will not have the option of getting a synthetic minor permit even if its actual emissions are well below the major source thresholds. Additionally, the Consent Decree dated November 10, 2003 states that CC was in violation of the MACT standard.

Table II-C-3: NSR Permits Issued to Capital Cabinets

Date Issued	Permit Number	Description
06/01/2009	ATC Modification 9, Revision 0	Modification of the existing ATC included an increase in size of the unpaved parking lot and addition of the dust collection system.
07/07/2008	ATC/OP Modification 8, Revision 0	Modification of the existing ATC/OP included an increase in the annual emission limit for HAP, the addition of an unpaved parking lot, and change of name. The permit included increase of the annual limit of hazardous air pollutants (HAPs).
11/05/2004	ATC/OP Modification 6	Modification of the existing ATC/OP intended to satisfy the requirements of the set forth in the Air Pollution Control Board Hearing Board Order issued on December 31, 2000 and incorporate the conditions of the consent decree (CV-S-03-146) between US EPA and Capital Cabinet entered on November 10, 2003.
12/26/2003	ATC/OP Modification 4	Modification of the existing ATC/OP included replacement of a baghouse and addition of two make-up air units of 2,592 MMBtu/hr each and two furnace units of 0.15 MMBtu/hr each.
01/25/2001	ATC/OP Modification 2, Revision 1	The administrative revision to the existing ATC/OP included addition of an infrared oven (IR oven), no change in PTE.
06/23/1999	ATC/OP Modification 2	Section 12 and 16 ATC/OP for five spray booths issued to Capital Cabinets Corporation.
12/23/1993	Permit No. A-482	Section 16 OP – permit for all emission units issued and sent to Capital Cabinets Corporation. New permit establishes VOC emission limit, VOC content limits for lacquer, stain, sealer, thinner, and contact cement. The permit sets conditions for monitoring, record keeping and reporting.
12/20/1989	Permit A48206	Section 16 OP - comprehensive permit for all emission units issued Capital Cabinets Corporation. New permit establishes limits for use of lacquer, stain, sealer, and contact cement. The permit sets conditions for record keeping and reporting.
11/29/1983	Section 8 OP (yellow tickets)	Section 8 OP (A48201 through A48206) for contact cement booth, contact bench # 2, stain booth, lacquer bench, and sealer bench, the permits indicate no conditions; no record keeping, and no reporting.

Table II-C-4: BACT Determinations for Capital Cabinets

EU	Description	BACT Technology	BACT Limit
A02 – A14	Spray Booths	Low and ultra-low VOC coating materials.	Max VOC PTE limited to 25 tpy.
B01 and B09	Woodworking Operations	Dust collection system with baghouses.	Baghouses shall have 99 percent control efficiency and shall not exhibit visible emissions (less than 20% opacity)
B03, B04, and B08	Fuel Burning Equipment.	Good operating practices	No limit stated.

D. Operating Scenario

Emission sources at the source are associated with wood processing and spray coating operations. The wood processing operations include use of sanders, saws, miters, and routers. The source has the capacity to process 9,450,000 ft² of lumber per year. The PM₁₀ emissions generated during wood processing operations are pneumatically captured and vented to a cyclone, and subsequently to a baghouse. The baghouse has a reported control efficiency of 99 percent.

Ten spray booths are located at the source to apply different coatings on the wood. The coatings include stains, sealers, topcoats, paints, and contact adhesives. Constructed cabinets are placed on the conveyor belt that passes through the stain, sealer, and topcoat spray booths. Some cabinets are sprayed with paint. The process flow diagram is presented in Figure II-D-1.

The source may operate 8,760 hours per year. The source is obligated to limit the VOC emissions to 25.0 tons per year and 3.0 tons per month and to limit HAP emissions to 24.40 tons per year and 3.0 tons per month.

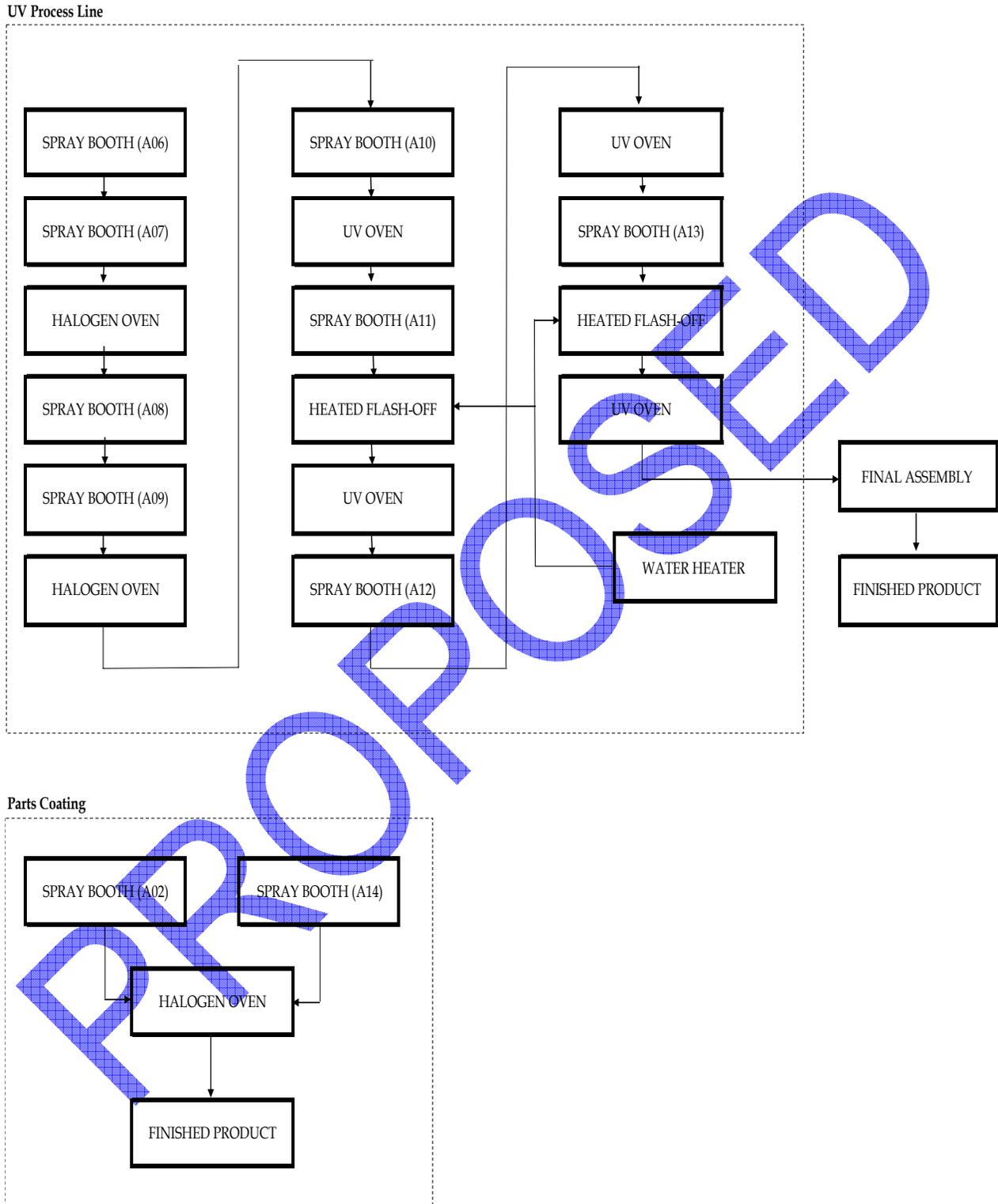


Figure II-D-1. Process Flow Diagram

E. Proposed Exemptions

There are no exemptions.

III. EMISSIONS INFORMATION

A. Total Source Potential to Emit

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 reflects the sum of the PTEs of all permitted emission units:

Table III-A-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

Production throughput of wood cabinet coating materials shall be monitored and controlled 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 following limits:

Table III-A-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	---

B. Emission Units and PTE

The following tables summarize the allowable limits for each emission unit.

Table III-B-1: List of Emission Units

EU	Description	SCC	Type ¹
A02	Spray Booth A02, M/N: N/A, S/N: 22933	40201901	SC1
A06	Global Finishing Solutions Spray Booth A06, M/N: CIDPP-127, S/N: 24717	40201901	SC1
A07	Global Finishing Solutions Spray Booth A07, M/N: CIDPP-127, S/N: 24717	40201901	SC1
A08	Global Finishing Solutions Spray Booth A08, M/N: CIDPP-127, S/N: 47927	40201901	SC1
A09	Global Finishing Solutions Spray Booth A09, M/N: CIDPP-127, S/N: 47927	40201901	SC1
A10	Superfici Spray Booth A10, M/N: ELMAG, S/N: 440286-010	40201901	SC1
A11	Superfici Spray Booth A11, M/N: ELMAG, S/N: 440286-004	40201901	SC1
A12	Superfici Spray Booth A12, M/N: ELMAG, S/N: 440286-002	40201901	SC1
A13	Superfici Spray Booth A13, M/N: ELMAG, S/N: 440286-011	40201901	SC1
A14	Spray Booth A14, M/N: N/A, S/N: 429213	40201901	SC1
B01	MAC Wood Working equipment with Dust Collection System and Baghouse, 70,000 cfm, S/N: 107883	30700701	P1
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	---

EU	Description	SCC	Type ¹
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	P1
B10	Unpaved Parking Lot, 7.56 acres	30502507	S1
B11	Wood Working equipment with Carter Day (Donaldson) Dust Collection System and Baghouse. 18,000 cfm	30700701	P1

¹Type codes for annual billing: SC1 = Surface Coating, P1 = process equipment, S1 = disturbed surfaces and stockpiles. Annual fees vary depending upon urban Consumer Price Index (CPI).

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

Table III-B-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

The emissions for the woodworking process were calculated using following formula:

$$PM_{10} \text{ Emissions} = W \cdot E (1 - CE_c)(1 - CE_b)$$

Where

- W = the number of square feet of wood processed.
- E = emission factor for PM₁₀ emissions from woodworking (0.032 lbs/ft²).
- CE_c = control efficiency of the cyclone (decimal).
- CE_b = control efficiency of the baghouse (decimal).

The actual VOC and HAP emissions are calculated based on the amount of coatings, adhesives, and solvents used by the facility. CC maintains monthly inventory of coating and solvent products procured and used at the facility. Based on the volume of each product used, the VOC and HAP emissions are calculated using the following formula:

$$VOC/HAP \text{ Emissions} = \sum W_i V_i$$

Where

- W_i = the weight fraction of VOC or HAP in each product (i), as determined from manufacturer's formulation data or other alternative methods approved by the US EPA or DAQEM.
- V_i = the total volume (gallons) of each product (i) used, as determined from the source inventory.

Table III-B-3: Emission Units PTE (tons per year)

EU	PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
A02 ¹	0.17	0.00	0.00	0.00	25.00	24.40
A06 ¹	0.17	0.00	0.00	0.00		
A07 ¹	0.17	0.00	0.00	0.00		

EU	PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
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
Total	8.41	3.36	2.82	0.03	25.18	24.43

¹ VOC and HAP, including volatile organic HAPs (VHAPs) emission limits listed for 10 spray booths (EU: A02 and A06- A14) in Table III-B-3 are average values and can vary depending on the production rate of each spray booth. However, the combined emissions from the use of coating materials shall not exceed 25.00 tons per year for VOC or 24.40 tons per year for combined HAP or 9.44 tons per year for any single HAP.

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

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

⁴ EU: B011 - 18,000 cfm, emissions 0.001 grains/scf.

D. Performance Testing

Performance testing of the wood working system (EU: B01 and B11) using EPA Methods 1 through 5. No subsequent performance testing shall be conducted if the initial performance test demonstrates compliance with the conditions of this permit. Initial performance test report for EU: B01 was submitted to DAQEM on June 1, 2005 and DAQEM accepted the report on October 18, 2005. The Permittee shall submit all required compliance and performance testing protocols for prior approval from DAQEM.

IV. REGULATORY REVIEW

A. Local Regulatory Requirements

DAQEM has determined that the following public law, statutes and associated regulations are applicable:

1. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq.;
2. Title 40 of the Code of Federal Regulations (CFR); including Part 70 and others;
3. Nevada Revised Statutes (NRS), Chapter 445; Sections 401 through 601;
4. Portions of the AQR included in the State Implementation Plan (SIP) for Clark County, Nevada. SIP requirements are federally enforceable. All requirements from Authority to Construct permits and Section 16 Operating Permits issued by DAQEM are federally enforceable because these permits were issued pursuant to SIP-included sections of the AQR; and
5. Portions of the AQR not included in the SIP. These locally applicable requirements are locally enforceable only.

The Nevada Revised Statutes (NRS) and the Clean Air Act Amendments (CAAA) are public laws that establish the general authority for the Regulations mentioned.

The DAQEM Part 70 (Title V) Program received Final Approval on November 30, 2001 with publication of that approval appearing in the Federal Register December 5, 2001 Vol. 66, No. 234. AQR Section 19 - Part 70 Operating Permits [Amended 07/01/04] details the Clark County Part 70 Operating Permit Program. These regulations may be accessed on the Internet at: <http://www.accessclarkcounty.com/depts/daqem/Pages/index.aspx>.

Local regulations contain sections that are federally enforceable and sections that are locally enforceable only. Locally enforceable only rules have not been approved by EPA for inclusion into the State Implementation Plan (SIP). Requirements and conditions that appear in the Part 70 OP which are related only to non-SIP rules are notated as locally enforceable only.

Table IV-A-1: AQR Section 12 and 55 Summary Table

	PM ₁₀	NO _x	CO	SO ₂	VOC	HAP
Source PTE (tpy)	8.41	3.36	2.82	0.03	25.18	24.43
Nonmajor Source	< 70 tpy	< 50 tpy	< 70 tpy	≤ 100 tpy	< 50 tpy	If single HAP ≤ 10 tpy and all HAP ≤ 25 tpy

Discussion: Capital Cabinets, a Division of MasterBrand Cabinets is a synthetic minor source for VOC and HAP.

Table IV-A-2: Clark County DAQEM – Air Quality and State Implementation Plan with Source Compliance or Requirement

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
0. Definitions	applicable definitions	yes	entire source
1. Definitions	applicable definitions – “Affected Facility”, “Air Contaminant”, “Air Pollution Control Committee”, “Area Source”, “Atmosphere”, “Board”, “Dust”, “Existing Facility”, “Fixed Capital Cost”, “Fumes”, “Health District”, “Hearing Board”, “Integrated Sampling”, “Minor Source”, “Mist”, “New Source”, “NIC”, “Point Source”, “Significant”, “Single Source”, “Smoke”, “Source of Air Contaminant”, “Standard Conditions”, and “Stop Order”.	yes	entire source
2. Air Pollution Control Board	all subsections	yes	entire source
4. Control Officer	all subsections	yes	entire source
5. Interference with Control Officer	all subsections	yes	entire source
6. Injunctive Relief	all subsections	yes	entire source
8. Persons Liable for Penalties - Punishment: Defense	all subsections	yes	entire source
9. Civil Penalties	all subsections	yes	entire source
10. Compliance Schedule	when applicable; applicable subsections	yes	entire source

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
11. Ambient Air Quality Standards	applicable subsections	yes	entire source
12. Preconstruction Review for New or Modified Stationary Sources	All subsections <u>except</u> the following: § 12.2.20 Additional Requirements for stationary sources with Beryllium, Mercury, Vinyl Chloride, or Asbestos emissions in Clark County	yes	The Part 70 OP requires CC to comply with all applicable requirements with respect to new or modified emission units.
16. Operating Permits	all subsections	yes	entire source
17. Dust Control Permit and Construction Activities	all subsections	yes	entire source
18. Permit and Technical Service Fees	§ 18.1 Operating Permit Fees § 18.2 Annual Emission Unit Fees § 18.4 New Source Review Application Review Fee § 18.5 Part 70 Application Review Fee § 18.6 Annual Part 70 Emission Fee § 18.14 Billing Procedures	yes	entire source
19. Part 70 Operating Permit Federal Approval (11/25/01)	§ 19.2 Applicability § 19.3 Part 70 Permit Applications § 19.4 Part 70 Permit Content § 19.5 Permit Issuance, Renewal, Re-openings, and Revisions § 19.6 Permit Renewal by the EPA and Affected States § 19.7 Fee Determination and Certification	N/A	entire source
20. Emission Standards for Hazardous Air Pollutants for Source Categories	§ 20.1 § 20.1.1 General Provisions § 20.1.15 Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations § 20.2 § 20.3	yes	entire source
24. Sampling and Testing - Records and Reports	§ 24.1 Requirements for installation and maintenance of sampling and testing facilities § 24.2 Requirements for emissions record keeping § 24.3 Requirements for the record format § 24.4 Requirements for the retention of records by the emission sources	yes	entire source
25.1 Upset/Breakdown, Malfunctions	§ 25.1 Requirements for the excess emissions caused by upset/breakdown and malfunctions	no	entire source
25.2 Upset/Breakdown, Malfunctions	§ 25.2 Reporting and Consultation	yes	entire source
26. Emission of Visible Air Contaminants	§ 26.1 Limit on opacity (\leq 20 percent for 6 minutes in a 60-minute period)	yes	entire source
40. Prohibitions of Nuisance Conditions	§ 40.1 Prohibitions	no	entire source
41. Fugitive Dust	§ 41.1 Prohibitions	yes	entire source
42. Open Burning	§ 42.2	no	entire source

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit
43. Odors In the Ambient Air	§ 43.1 Prohibitions coded as Section 29	no	entire source
55. Preconstruction Review for New or Modified Stationary Sources in the 8-hour Ozone Nonattainment Area	all subsections	no	entire source
60. Evaporation and Leakage	all subsections	yes	entire source
80. Circumvention	all subsections	yes	entire source
81. Provisions of Regulations Severable	all subsections	yes	entire source
90. Fugitive Dust from Open Areas and Vacant Lots	all subsections	no	entire source
91. Fugitive Dust from Unpaved Roads, Unpaved Alleys, and Unpaved Easement Roads	all subsections	no	entire source
92. Fugitive Dust from Unpaved Parking Lots	all subsections	no	entire source

PROPOSED

AQR SECTION 11 - AMBIENT AIR QUALITY STANDARDS

Table IV-A-3: PSD Increment Consumption

Pollutant	Averaging Period	PSD Increment Consumption by the Source ($\mu\text{g}/\text{m}^3$)	Location of Maximum Impact	
			UTM X (m)	UTM Y (m)
SO ₂	3-hour	0.47 ¹	668898	4010546
SO ₂	24-hour	0.29 ¹	668898	4010546
SO ₂	Annual	0.10	668898	4010546
NO _x	Annual	7.94	668898	4010546

¹Modeled 2nd High Concentration

Table IV-A-3 shows the location of the maximum impact and the potential PSD increment consumed by the source at that location. The impacts are below the PSD increment limits.

B. Federally Applicable Regulations

40 CFR PART 63 – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart A - General Provisions

40 CFR § 63.4 – Prohibited activities and circumvention

Discussion: This prohibition is addressed in the Part 70 OP. This is also local rule 80.1.

40 CFR § 63.7 - Performance tests

Discussion: These requirements are found in the Part 70 OP. Notice of intent to test; the applicable test methods, acceptable test method operating conditions, and the requirement for three runs are outlined in this regulation. DAQEM requirements for initial performance testing are identical to § 63.7. DAQEM also requires periodic performance testing on emission units based upon throughput or usage. More discussion is in this document under the compliance section.

40 CFR § 63.10 – Recordkeeping and reporting requirements.

Discussion: This regulation requires notification to DAQEM of modifications, opacity testing, records of malfunctions of process equipment, and performance test data. These requirements are found in the Part 70 OP.

Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations

40 CFR § 63.800 - Applicability.

Discussion: For a source to be subject to the requirements of Subpart JJ, the source should manufacture wood furniture or wood furniture components and should be a major source as defined in 40 CFR Part 63, Subpart A, 63.2. Subpart JJ applies to the source

based on the past PTE (major source), the standard applicability dates, and the “Once In, Always In” EPA policy.

40 CFR § 63.801 – Emission Limits

Discussion: The source will meet emission limitations through application of coatings with VOC content less than 0.8 lb VOC/lb solid. The measurements to be taken are outlined in the Part 70 OP.

40 CFR § 63.803 – Work Practice Standards

Discussion: The source will maintain written work practice implementation plan and training program on work practice standards for all affected employees. The source will implement leak inspection plan; will apply low VOC solvents and their accounting methods; and will use solvent storage and application procedures to minimize VOC emissions. The measurements to be taken are outlined in of the Part 70 OP.

40 CFR § 63.804 – Compliance Procedures and Monitoring Requirements

Discussion: The source will comply with emission limitations through finishing materials averaging. The compliance demonstration for the source is discussed in the Part 70 OP.

40 CFR § 63.805 – Performance Test Methods

Discussion: The EPA Method 311 and/or formulation data will be used to determine VHAP content of liquid coatings. The EPA Method 24 will be used to determine the solid content and density. The compliance demonstration for the source is discussed in the Part 70 OP.

40 CFR § 63.806 – Recordkeeping Requirements

Discussion: All records will be kept in accordance with 63.10(b)(1). The source will maintain: certified MSDS for each finishing material, thinner, contact adhesive, and coating; records of monthly VHAP calculations and supporting materials; and copies of compliance certifications. The compliance demonstration for the source is discussed in the Part 70 OP.

40 CFR § 63.807 – Reporting Requirements

Discussion: The source will comply with the reporting requirements of 40 CFR 63 Subparts 63.7-63.10. The compliance demonstration for the source is discussed in the Part 70 OP.

V. COMPLIANCE

A. Compliance Certification

19.3.3.9 Requirements for compliance certification:

- a. Regardless of the date of issuance of this Part 70 OP, the schedule for the submittal of reports to the Control Officer shall be as follows:

Table V-A-1: Reporting Schedule

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

- b. A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods.
- c. A schedule for submission of compliance certifications during the permit term.
- d. A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act.

B. Compliance Summary

Citation	Title	Applicability	Applicable Test Method	Compliance Status
CCAQR Section 0 [Definitions.	Applicable – CC will comply with all applicable definitions as they apply.	CC will meet all applicable test methods should new definitions apply.	CC complies with applicable requirements.
CCAQR Section 4	Control Officer.	Applicable – The Control Officer or his representative may enter into CC property, with or without prior notice, at any reasonable time for purpose of establishing compliance.	Capital Cabinets will allow Control Officer to enter CC property as required.	CC complies with applicable requirements.
CCAQR Section 11	Ambient Air Quality Standards.	Applicable – CC is a source of air pollutants.	CC demonstrated compliance in the ATC/OP permit application with air dispersion modeling.	CC complies with applicable requirements.
CCAQR Section 12.1	General application requirements for construction of new and modified sources of air pollution.	Applicable – CC applied for and the ATC certificate was issued before commencing construction.	CC received the ATC permit to construct.	CC complies with applicable requirements.
CCAQR Section 12.2.2	Requirements for specific air pollutants: PM ₁₀ emission source located in the Serious Non-Attainment Area.	Applicable – CC has PM ₁₀ PTE < 70 TPY.	All new or modified emission units at the CC will meet BACT requirement.	CC complies with applicable requirements.
CCAQR Section 12.2.7	Requirements for specific air pollutants: CO sources located in the Serious Non-Attainment Area.	Applicable – CC has CO PTE < 70 TPY.	All new or modified emission units at the CC will meet BACT requirement.	CC complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
CCAQR Section 12.2.11	Requirements for specific air pollutants: VOC sources located in the VOC Management Area.	Applicable – CC has NO _x PTE < 50 TPY.	All new or modified emission units at the CC will meet BACT requirement.	CC complies with applicable requirements.
CCAQR Section 12.2.14	Requirements for specific air pollutants: NO _x sources located in the NO _x Management Area.	Applicable – CC has NO _x PTE < 50 TPY.	All new or modified emission units at the CC will meet BACT requirement.	CC complies with applicable requirements.
CCAQR Section 12.2.16	Requirements for specific air pollutants: SO ₂ sources located in the PSD area.	Not Applicable – CC has SO ₂ PTE < 40 TPY.	All new or modified emission units at the CC will meet BACT requirement.	CC complies with applicable requirements.
CCAQR Section 12.2.19	Requirements for specific air pollutants: TCS sources in Clark County	Not Applicable – CC does not have any TCS emissions.	Not Applicable.	Not Applicable.
CCAQR Section 12.5	Air Quality Models	Applicable – Dispersion modeling performed will be performed as required for any future major modifications.	As applicable, future dispersion modeling will be performed in ATC permit modifications will be in accordance with provisions of 40 CFR Part 51, Appendix W.	CC complies with applicable requirements.
CCAQR Section 16	DAQEM Operating Permits	Applicable – Any emission unit of stationary source must apply for and obtain a DAQEM operating permit Station applied for the operating permit from DAQEM.	CC applied for and received operating permit from DAQEM prior to commercial operation.	CC complies with applicable requirements.
CCAQR Section 17	Dust Control Permit for Construction Activities Including Surface Grading and Trenching	Applicable – CC will need to apply for dust control permit in event construction activity greater than ¼ acre (aggregate) or trench at least 100 ft in length (and aggregate acreage greater than ¼ acre).	CC applied for permits as needed during initial construction and conformed to required best management practices in dust control permit. Station will continue to do so in future as needed.	CC complies with applicable requirements.
CCAQR Section 18	Permit and Technical Service Fees	Applicable – CC will be required to pay all required/applicable permit and technical service fees.	CC is required to pay all required/applicable permit and technical service fees.	CC complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
CCAQR Section 19	40 CFR Part 70 Operating Permits	Applicable – CC is a synthetic minor stationary source and under consent decree with EPA submitted the Part 70 initial Title V permit application. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months or commencing operation of any new emission unit. Section 19 is both federally and locally enforceable	CC submitted initial Part 70 application on June 15, 2005. Applications for new units will be submitted within 12 months of startup.	CC complies with applicable requirements.
CCAQR Section 20	Emission Standards for Hazardous Air Pollutants for Source Categories	Applicable – CC has PTE of one or more HAP listed in the AQR.	CC will demonstrate compliance using methods presented in 40 CFR 63.804.	CC complies with applicable requirements.
CCAQR Section 20.1.15	Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations.	Applicable – CC operates wood furniture manufacturing facility with HAP emissions.	CC will demonstrate compliance using methods presented in 40 CFR 63.804.	CC complies with applicable requirements.
CCAQR Section 25	Upset/Breakdown, Malfunctions	Applicable – Any upset, breakdown, emergency condition, or malfunction which causes emissions of regulated air pollutants in excess of any permit limits shall be reported to Control Officer. Section 25.1 is locally and federally enforceable.	Any upset, breakdown, emergency condition, or malfunction in which emissions exceed any permit limit shall be reported to the Control Officer within one (1) hour of onset of such event.	CC complies with applicable requirements.
CCAQR Section 26	Emissions of Visible Air Contaminants	Applicable – Opacity for the CC baghouse must not exceed 20 percent as demonstrated by EPA Method 9.	Compliance determined by EPA Method 9.	CC complies with applicable requirements.
CCAQR Section 27	Particulate Matter from Process Weight Rate	Not Applicable.	Not Applicable.	Not Applicable.
CCAQR Section 28	Fuel Burning Equipment	Applicable – The PM emission rate for the air heaters is well below those established based on Section 28 requirements.	Maximum allowable PM emission rate determined from equation in Section 28.	CC complies with applicable requirements.
CCAQR Section 29	Sulfur Content of Fuel Oil	Not Applicable.	Not Applicable.	Not Applicable.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
CCAQR Section 40	Prohibition of Nuisance Conditions	Applicable – No person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance. Section 40 is locally enforceable only.	CC air contaminant emissions controlled by pollution control devices or good combustion in order not to cause a nuisance.	CC complies with applicable requirements.
CCAQR Section 41	Fugitive Dust	Applicable – CC shall take necessary actions to abate fugitive dust from becoming airborne.	CC utilizes appropriate best practices to not allow airborne fugitive dust.	CC complies with applicable requirements.
CCAQR Section 42	Open Burning	Applicable – In event CC burns combustible material in any open areas, such burning activity will have been approved by Control Officer in advance. Section 42 is a locally enforceable rule only.	CC will contact the DAQEM and obtain approval in advance for applicable burning activities as identified in the rule.	CC complies with applicable requirements.
CCAQR Section 43	Odors in the Ambient Air	Applicable – An odor occurrence is a violation if the Control Officer is able to detect the odor twice within a period of an hour, if the odor causes a nuisance, and if the detection of odors is separated by at least fifteen minutes. Section 43 is a locally enforceable rule only.	CC will not operate its facility in a manner which will cause odors. CC is a wood cabinets manufacturing facility and is not expected to cause odors.	CC complies with applicable requirements.
CCAQR Section 49	Emission Standards for Boilers and Steam Generators Burning Fossil Fuels	Not Applicable – CC does not have any boilers with heat capacity greater than 4.0 MMBtu/hr.	Not Applicable.	Not Applicable.
CCAQR Section 55	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area	Applicable – CC is located in Las Vegas Valley airshed (hydrographic area 212) and will need to meet the applicable emission control requirements at times of future modifications.	In the event CC undertakes a major modification, the facility will have to apply BACT and LAER control requirements.	CC complies with applicable requirements.

C. Federal Air Quality Regulations Applicable to Capital Cabinets

Citation	Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 52.1470	SIP Rules	Applicable – CC is classified as a Title V source, and SIP rules apply.	Applicable monitoring and record keeping of emissions data.	CC is in compliance with applicable state SIP requirements including monitoring and record keeping of emissions data.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)	Applicable – Emissions from stacks are subject to opacity standards.	Opacity determined by EPA Method 9.	CC complies with applicable requirements.
40 CFR Part 63, Subpart A	National Emission Standards for Hazardous Air Pollutants for Source Categories – General Provisions	Applicable – CC is an affected facility under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	CC complies with applicable requirements.
40 CFR Part 63, Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations	Applicable – CC is an affected facility under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	CC complies with applicable requirements.
40 CFR Part 70	Federally Mandated Operating Permits	Applicable – CC is a major stationary source and under Part 70 the initial Title V permit application was submitted as required. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months or commencing operation of any new emission unit.	CC submitted the initial Part 70 permit application on March 30, 2005.	CC complies with applicable requirements.

VI. EMISSION REDUCTION CREDITS

The source is subject to offset requirements in accordance with Section 59 of the Clark County Air Quality Regulations. Offset requirements and associated mitigation are pollutant-specific.

VII. ADMINISTRATIVE REQUIREMENTS

Section 19 requires that DAQEM identify the original authority for each term or condition in the Part 70 Operating Permit. Such reference of origin or citation is denoted by [italic text in brackets] after each Part 70 Permit condition.

DAQEM proposes to issue the Part 70 Operating Permit conditions on the following basis:

Legal:

On December 5, 2001 in Federal Register Volume 66, Number 234 FR30097 the EPA fully approved the Title V Operating Permit Program submitted for the purpose of complying with the Title V requirements of the 1990 Clean Air Act Amendments and implementing Part 70 of Title 40 Code of Federal Regulations.

Factual:

Capital Cabinets, a Division of MasterBrand Cabinets has supplied all the necessary information for DAQEM to draft Part 70 Operating Permit conditions encompassing all applicable requirements and corresponding compliance.

Conclusion:

DAQEM has determined that Capital Cabinets, a Division of MasterBrand Cabinets will continue to determine compliance through the performance testing, quarterly reporting, daily recordkeeping, coupled with annual certifications of compliance. DAQEM proceeds with the decision that a Part 70 Operating Permit should be issued as drafted to Capital Cabinets, a Division of MasterBrand Cabinets for a period not to exceed five (5) years.

PROPOSED