

Air Permit Review

Permit Issue Date: **date, 2011**

Region: Winston-Salem Regional Office
County: Randolph
NC Facility ID: 7600198
Inspector's Name: Ray Stewart
Date of Last Inspection: 03/29/2011
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Norcraft Companies, LP, dba UltraCraft Cabinetry</p> <p>Facility Address: Norcraft Companies, LP, dba UltraCraft Cabinetry 6163 Old US 421 Liberty, NC 27298</p> <p>SIC: 2434 / Wood Kitchen Cabinets NAICS: 33711 / Wood Kitchen Cabinet and Countertop Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 7600198.10A Date Received: 11/30/2010 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05951/T19 Existing Permit Issue Date: 03/12/2009 Existing Permit Expiration Date: 08/31/2011</p>
<p>Joann Kirkman Human Resources Manager (336) 622-7612 6163 Old 421 Road Liberty, NC 27298</p>	<p>William Reimer Sr VP Operations (336) 622-4281 6163 Old 421 Road Liberty, NC 27298</p>	<p>Jim Mullen Director-Facilities (336) 622-7615 6163 Old 421 Road Liberty, NC 27298</p>	
<p>Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2011</p>		<p style="text-align: center;">Comments / Recommendations: Issue 05951/T20 Permit Issue Date: date, 2011 Permit Expiration Date: date, 2016</p>	

I. Purpose of Application

This permitting action is for renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05951T19**) was issued on **March 12, 2009**, with an expiration date of **August 31, 2011**. The renewal application was received on **November 30, 2010**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a laminated wood kitchen and bathroom cabinet manufacturer.

III. History/Background/Application Chronology

September 18, 2006 – Permit **05951T17** issued as a Title V first time permit.

March 7, 2007 – Permit **05951T18** issued as a 502(b)(10) modification to add one spray booth.

March 12, 2009 – Permit **05951T19** issued as a name change.

November 30, 2010 – Permit application **7600198.10A** received as a TV renewal application. Application deemed complete and assigned to Judy Lee for processing.

December 14, 2010 – Received WSRO “Comments and Recommendations on Air Permit Application” document from Ray Stewart.

March 29, 2011 – Ray Stewart of the WSRO completed facility annual inspection.

October 12, 2011 – Application **7600198.10A** re-assigned to Mark Cuilla for processing.

date, 2011 – Draft permit sent to regional office and Permittee for review prior to public notice and EPA review.

date, 2011 – Draft permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Attachment	Insignificant activities	-amended permit revision number -added shell asterisk language
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3	Equipment table	-added equipment description clarification for combustion sources (added “direct”)
4	2.1 A.2.b	-corrected testing rule cross reference
4-5	2.1 A.2.c	-added ID numbers and updated shell monitoring language
6	2.1 B.1.b 2.1 B.2.b	-updated shell monitoring language -corrected testing rule cross reference
7	2.1 B.2.c	-added ID numbers and updated shell monitoring language
8	2.1 B.3.e 2.1 C 2.1 C.1.a	-updated shell reporting language -added equipment description clarification -added ID numbers
9	2.1 C.1.b 2.1 C.1.c 2.1 C.2.b 2.1 C.2.c	-corrected testing rule cross reference -added ID numbers -corrected testing rule cross reference -added ID numbers
11	2.2 A.3.b 2.2 A.4	-updated shell reporting language -added rule citation clarification
12	2.2 A.4 (TAP table)	-added CAS numbers for each TAP and corrected the position of the phenol limit within the table

Page	Section	Description of Change
13-23	General Conditions	-updated shell conditions (v3.5)
24	List of Acronyms	-added acronyms for CAIR and NAA

The title V equipment editor (TVEE) was updated to match the renewed permit as necessary.

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration and 15A NCAC 2D .1111, Maximum Achievable Control Technology)
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT/112j – The Permittee is currently subject to permit restrictions limiting emissions of hazardous air pollutants (HAPs) to less than 10 tons per year of each individual HAP and less than 25 tons per year of the combination of all HAPs in order to avoid applicability to the MACT standards (specifically Subpart JJ). The current permit includes requirements that the Permittee monitor and report the quantities of HAP containing materials used each month. This permit renewal does not affect this status.

This MACT avoidance defines the facility as a Title III minor facility. There are no area source GACTs applicable to this facility.

PSD – The Permittee currently operates under a facility-wide volatile organic compound (VOC) prevention of significant deterioration (PSD) avoidance limit of 250 tons per year in order to be classified as a PSD minor facility. The permit includes a requirement to calculate VOC emissions monthly and submit semi-annual reports of the monthly and yearly totals. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table indicates the current equipment/control device relationships:

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
WCS-1 WCS-2	Two woodworking operations	BF-1	One fabric filter (6,720 square feet of filter area)

A CAM analysis was performed during the processing of the first time Title V permit (See Kevin Godwin’s **September 18, 2006** permit review for **05951T17**). CAM was determined not to apply to this control device because potential pre-controlled PM₁₀ emissions were less than CAM applicability thresholds.

VII. Facility Wide Air Toxics

The Permittee is subject to the following NC air toxics regulations:

1. 15A NCAC 2D .1100. This regulation limits facility-wide emissions of formaldehyde to less than 0.633 pounds per hour. This limit was established per approved modeling demonstration. The Permittee is required to keep daily logs of the hourly formaldehyde emissions and submit quarterly reports of those records. This permit renewal does not affect this status.
2. 15A NCAC 2Q .0711. This regulation lists the toxic permitting emission rates (TPERs) for each regulated TAP. The Permittee has made a demonstration that emissions of the listed pollutants are each below their respective TPERs. A permit modification is required prior to exceeding any of these limits. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility:

Pollutant(s)	2009 Actual Emissions (tpy)	2010 Actual Emissions (tpy)
CO	0.57	0.67
NO _x	0.68	0.8
PM ₁₀	0.52	0.16
SO ₂	0.01	-
VOC	84.25	109.75
Total HAP/TAP	8.76	13.72

IX. Stipulation Review

The facility was last inspected by Ray Stewart of the WSRO on **March 29, 2011**. Based on his visual observations and records review, the facility appeared to be in compliance with the permit and applicable DAQ regulations.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be made (via DAQ website). The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The state of Virginia and the Forsyth County Local Program are each affected areas within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WSRO's recommendation to issue the renewed air permit.