Title V Air Operation Permit Renewal
Permit No. 0830137-006-AV

APPLICANT

The applicant for this project is Masco Cabinetry LLC. The applicant's responsible official and mailing address are: Mr. Bob Terhune, VP – Operations, Masco Cabinetry LLC, 4600 Arrowhead Drive, Ann Arbor, MI 48105.

FACILITY DESCRIPTION

The applicant operates the Ocala Plant, which is located in Marion County at 1300 SW 38th Avenue, Ocala, Florida.

The existing facility consists of woodworking and finishing operations for the manufacturing of kitchen and bath cabinets. There are four cabinet manufacturing finishing lines, each consisting of an overhead hanging conveyor system and a series of high-volume low pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. The finishing lines and associated glaze line and offline booths are sources of volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions and are subject to the applicable requirements of 40 CFR 63 Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations. The facility also has an existing emergency fire pump. The fire pump's diesel engine is subject to applicable requirements of 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE).

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued December 27, 2006
Application for a Title V Air Operation Permit Renewal received June 1, 2011
Additional Information Request dated June 14, 2011
Additional Information Responses received June 16 and 17, 2011
Notice of Intent to Issue Air Permit issued TBD
Public Notice Published TBD

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operates emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the emissions units at the facility since the VOC/HAP emissions are emitted without control equipment.

PROJECT REVIEW

The changes made to the Title V Air Operation Permit as part of this renewal include the following:

- The renewal permit was written using the new Tallahassee Title V template (i.e. reformatting, replacement of TV-6 with new Appendix TV, moving common Title V permit conditions to the new appendices, etc.).
- A new Emissions Unit No. 004 was added for an existing emergency fire pump, whose diesel engine is subject to NESHAP 40 CFR 63, Subpart ZZZZ.
- The descriptions of EU Nos. 001 and 002 – Cabinet Manufacturing Lines 1-4 were expanded to include detailed process area and equipment information.
- A fuel limitation on the curing ovens was included in this renewal as this limitation was established in Construction Permit No. 0830137-003-AC (see Permit Condition No. A.1.).
- Recordkeeping requirements for EU Nos. 001 and 002 – Cabinet Manufacturing Lines 1-4 were changed to match the recordkeeping requirements in Construction Permit No. 0830137-003-AC (see Permit Condition Nos. A.6. and A.7.).
- The previous Title V Air Operation Permit No. 0830137-005-AV was inconsistent in terms of how to regulate the three dust collectors associated with the woodworking operations. It listed the woodworking operations as insignificant activities yet it required the baghouses be tested for visible emissions (VE) 180 days prior to the permit expiration date. The permitted has confirmed that the exhausts of the baghouses normally return to the manufacturing building and do not discharge into the ambient atmosphere. The external exhaust option would only be used in the event of an emergency (e.g., fire). The operators also activate the external exhausts just for the purpose of conducting a VE test. Based on this information, it is more appropriate to classify these baghouses as insignificant sources. The permit conditions associated with VE testing were removed from the permit.

Note: This facility has been under a long-term shutdown status since October 31, 2008. In accordance with Rule 62-210.300(2)(a)b., F.A.C., the operation permit shall be renewed for a period not to exceed five years from the date of shutdown. Therefore this renewal permit will expires on October 31, 2013.

CONCLUSION

This project renews Title V air operation permit No. 0830137-005-AV, which was issued on December 27, 2006. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.