

Zhang-Torres

From: Joseph L. Green [Joseph.Green@MascoCabinetry.com]
Sent: Friday, June 10, 2011 1:05 PM
To: Zhang-Torres
Cc: Scott Tift; MBallenger@trinityconsultants.com
Subject: RE: Ocala, FL DEP- AIR Permit Application for Title V Renewal - ID 0830137 information

Cindy, following my inquiries this morning, I checked with Masco Cabinetry's Ocala plant engineer - Scott Tift on the issues that we discussed, and found the following.

As indicated in Appendix A of our 2005 application (which was recently incorporated by reference), the baghouse air flow is "normally returned to the manufacturing building but can also be vented to the atmosphere via exhaust stacks." Scott advises that the external exhaust option would only be used in the event of an emergency (e.g. a fire), although it could also be activated just to facilitate a Method 9 opacity check. Based on our discussions, it seems as though the return of this exhaust into the building may relieve the applicability of emissions standards, which would only be triggered by the use of the external exhaust feature (an unlikely and rare prospect). Since the baghouse units are well maintained, a simple visible emissions (VE) check (e.g. Method 22) could provide reasonable assurance of compliance if an external exhaust needs to be activated in place of the normal air return routing.

Additionally, I noticed an Appendix B (~8 pages) in our current permit file for 40 CFR Part 63 Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations compliance requirements. As we discussed today, I would expect a routine updating of these previously existing provisions, which were apparently in place for this site already.

I hope this information is helpful, but please advise if you have any further questions regarding these matters.

Sincerely,

Joe L. Green, Senior Environmental Engineer
Masco Cabinetry - Corporate Environmental Group
4600 Arrowhead Drive
Ann Arbor, MI 48105

Direct: 734-205-4630
Cell: 440-635-6467

Corporate Office
Phone: 734-205-4600

E-mail: Joseph.Green@MascoCabinetry.com
Websites: <http://mascocabinetry.com/>

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From: Zhang-Torres [mailto:Cindy.Zhang-Torres@dep.state.fl.us]
Sent: Thursday, June 02, 2011 9:47 AM
To: Joseph L. Green
Subject: RE: Ocala, FL DEP- AIR Permit Application for Title V Renewal - ID 0830137