

Zhang-Torres

From: Joseph L. Green [Joseph.Green@MascoCabinetry.com]
Sent: Thursday, June 16, 2011 10:47 AM
To: Zhang-Torres
Cc: Michael Ballenger; Scott Tift
Subject: FW: Masco Cabinetry LLC - Permit No.: 0830137-006-AV - Ocala NESHAP Subpart JJ confirmation
Attachments: Subpart JJ Requirements.doc

Ms. Zhang-Torres, as requested, I've reviewed the proposed 40 CFR Part 63, Subpart JJ, listing (enclosed) and have only one minor request. If possible, please add the word "renewal" to clarify that our 6/1 application is for an "existing source". Otherwise, this listing seems to be a routine updating of the previously established NESHAP requirements for these operations. To that end, we will continue to use compliant coatings and averaging calculations in accordance with the 40 CFR 63.804 (d) provisions for demonstrating compliance with this standard.

Thank you for providing us with the opportunity to review this matter, for which we will execute the required EPSAP submittal.

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: Wednesday, June 15, 2011 4:01 PM
To: Joseph L. Green
Subject: RE: Masco Cabinetry LLC - Permit No.: 0830137-006-AV - additional information

Hi, Joe,

A few days ago, when we spoke on the phone, I mentioned to you I would send a list of applicable requirements of 40 CFR 63, Subpart JJ that will be included in the Title V permit. Unfortunately I forgot to include the list to the letter I sent to you yesterday. Please see the attached word document. Please verify the accuracy of the list including the notes, as this will be part of the permit.

Also, which compliance method specified under Section 63.804(d) will the facility use to demonstrate compliance?

Please give me a call if you have any questions.

Thanks.

Cindy

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Joseph L. Green [<mailto:Joseph.Green@MascoCabinetry.com>]

Sent: Wednesday, June 15, 2011 3:15 PM

To: Zhang-Torres

Cc: Prickett, Patricia; Scott Tift

Subject: RE: Masco Cabinetry LLC - Permit No.: 0830137-006-AV - additional information

Ms. Zhang-Torres, thank you for calling this afternoon to discuss your questions regarding the subject permit renewal.

As indicated, we will upload additional information into Florida DEP's on-line system to address your 6/14 requests:

1. The 12/08/2008 Masco letter to DEP established 10/31/2008 as a "Plant Idling" date
2. Our electronic site drawing, as submitted by e-mail today, shows the following:
 - Line #1 as a finishing line running from drawing lines D-E, 5-9
 - Line #2 as a finishing line running from drawing lines F-G, 5-9
 - Line #3 as a finishing line running from drawing lines G-H, 5-9
 - Line #4 as a finishing line running from drawing lines J-M, 5-9
3. A top shop has not yet been constructed, but will be an insignificant, inside source.

Accordingly, we will promptly re-submit this information into EPSAP with the required (electronic) RO signature.

Please advise me if you should have any additional questions. Sincerely,

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Federal Regulatory Requirements: This emission unit is subject to and shall comply with the applicable requirements of 40 CFR 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, adopted and incorporated by reference in Rule 62-204.800(11), F.A.C. These requirements are shown in their entirety in Appendix NESHAP 40 CFR 63 Subpart JJ, which is a part of this permit.

40 CFR 63 Subpart JJ Applicable Provision References

(Note: Entire section applies unless otherwise noted with specific applicable subsection references)

- § 63.800 Applicability
 (a), (d), (f) and (g)
- § 63.801 Definitions
- § 63.802 Emission Limits
 (b)
- § 63.803 Work practice standards.
- § 63.804 Compliance procedures and monitoring requirements
 (d), (e)(1), (f) except (f)(4) and (f)(6), and (g) except (g)(4) and (g)(6)
- § 63.805 Performance test methods
 (a)
- § 63.806 Recordkeeping requirements
 All except (f) and (g)
- § 63.807 Reporting requirements
 All except (d)
- § 63.808 Implementation and enforcement

Table 1. General Provisions (NESHAP Subpart A) Applicability to Subpart J)

Table 2. List of Volatile Hazardous Air Pollutants

Table 3. Summary of Emissions Limits

Table 4. Pollutants Excluded from Use in cleaning and Washoff Solvents

Table 5. List of VHAP of Potential Concern Identified by Industry

Table 6. VHAP of Potential Concern

{Permitting Note: This facility is considered a new affected source under 40 CFR 63, Subpart JJ. The above applicability references are based upon current operations as reflected in the Title V air operation permit application received on 6/1/11. Any change in operations may change the applicable provisions.}

[Rule 62-204.800(11), F.A.C.; 40 CFR 63, Subpart JJ and Subpart A]