

Facility Name: **Woodgrain Millwork, Inc.**
 City: Leesburg
 County: Lee
 AIRS #: 04-13-177-00010

Application #: TV-754451
 Date Application Received: May 25, 2023
 Permit No: 2431-177-0010-V-06-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:

Woodgrain Millwork, Inc

2. Parent/Holding Company Name

Woodgrain Millwork, Inc.

3. Previous and/or Other Name(s)

None

4. Facility Location

471 Highway 82 West
Leesburg, Georgia 31763
(Lee County)

5. Attainment, Non-attainment Area Location, or Contributing Area

This facility is located in Lee County, which is designated as an attainment area for all criteria pollutants.

B. Site Determination

This facility comprises one Title V site; there are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2431-177-0010-V-05-0	November 21, 2018	Title V Renewal
Off Permit Change	March 29, 2022	Adding a door manufacturing line.

D. Process Description

1. SIC Codes(s)

2431

2. Description of Product(s)

This facility manufactures finished and unfinished decorative wood moldings.

3. Overall Facility Process Description

Woodgrain Millwork operates five basic production lines: Medium Density Fiberboard (MDF) molding, substrate preparation, door assembly and finishing, coatings, and lamination.

The facility has four MDF lineal molding lines. In each of these lines, Medium Density Fiberboard sheets are ripped and molded to lineal profile. Dust is controlled by existing baghouse BH03. The molded profile is transferred through an IR oven to remove surface moisture, the air in the ovens is exhausted to the atmosphere, and the molded lineal profile is transferred through the coating process where a PVC coating is extruded onto the surface of the part. The part is then bar-coded, and brand marked. The molded part is subsequently trimmed to the proper length. Dust is controlled at this trim station by existing baghouse, BH03. Lastly, the product is packaged for shipping.

In substrate preparation, sheet stock medium density fiberboard (MDF), particle board, plywood, and other sheet stock are ripped to size and profiled through a molder. The wood dust from these sources is controlled by baghouses BH01, BH02, and BH03.

Moldings, cabinet parts, and furniture parts are also shaped and sized in the substrate preparation processes. They are either finished with various painting steps and colors in the coating process, or by applying simulated wood papers and other pre-finished materials to the surface of the parts (substrate) in the lamination processes.

For door assembly and finishing operations, fiberboard skins of MDF are assembled and pressed together with a water based PVA adhesive. The doors are moved into a spray booth for the edges to be primed with a water-based primer. Doors enter a second spray booth for the edges to be finished with a water-based paint. Particulate emissions are controlled by filters. These booths, including the stand-alone custom finishing booth are also equipped with standard dry filters.

In the coatings process, moldings can be sent to one of three finishing lines from the warehouse, the satin coat process, water base paint line, or the base coat paint line. Dust from the sander denibber and sanders are controlled by Baghouse BH03. Fugitive emissions from the oven curing operations are released within the building. Emissions from the base coat line oven include VOC/HAP emissions from curing as well as a small number of emissions associated with natural gas combustion, which are released in the building. Emissions from the cleaning operation are also released within the building.

On February 1, 2022, the facility submitted Off Permit Change request to install a new door manufacturing line that includes sawing, molding and assembly equipment. The emissions are controlled using baghouse BH05.

GEOS application also indicates that the facility added Water Based Primer Coating Line DR04. The emissions from this line are controlled using dry filter DR04.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This source is considered a minor source for PSD. Condition No. 2.1.1 limits VOC emissions from the facility to 249 tons during any twelve consecutive months. Because this source is not located in a non-attainment area, nonattainment NSR does not apply.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility’s Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	N/A			
H ₂ S	N/A			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The facility was a major source for HAPs when the “National Emission Standards for the Printing and Publishing Industry,” Subpart KK, was promulgated, and EPD had made past determination that the facility was subject to the NESHAP Subpart KK. However, the Applicability Determination Index (ADI) dated Sept. 23, 2003, indicated that a facility that primarily applies

finishing to architectural molding materials is regulated under MACT subpart QQQQ instead of MACT subpart KK. The Division has determined that subpart QQQQ is the prevailing MACT. Since the facility became a synthetic minor before the promulgation date for subpart QQQQ, the facility is not subject to MACT subpart QQQQ.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Condition No. 2.1.1 limits VOC from the entire facility to 249 tons during any twelve consecutive months; this limit was imposed for purposes of PSD avoidance.

Woodgrain has the potential to be a major source for hazardous air pollutants. However, the facility requested a limit on HAP emissions of 10 tons and 25 tons for any twelve consecutive months. This limit makes the facility a minor source for HAPs therefore enabling the facility to avoid applicability to the “National Emission Standards for the Surface Coating of Wood Building Products.”

B. Applicable Rules and Regulations

Not applicable

C. Compliance Status

The facility did not indicate any compliance issues in this application

D. Permit Conditions

Condition 2.1.1: Establishes the VOC limit of 249 tons during any twelve consecutive month period.

Condition 2.1.2: Establishes the individual and combined HAP limit of 10 and 25 tons, respectively, During any twelve consecutive month period.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
DS01	Water-based line double spray booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	AP01	Arrestor Pads
PR01	Base Coat Pattern transfer operation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
PM01	Base Coat line paint mixing	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
FC03	Base Coat Line – Coating Line No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	AP01	Arrestor Pads
FC01, FC02, FC04, FC05, FC06	Base Coat Line- Coating Line No:3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
PF01	Base Coat line oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	None
FO01	Base Coat line flash-off area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
WW01	Woodworking and MDF Woodworking	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH01, & BH02	Baghouses
	Door Line Saw		BH04	
DR01	Water-based Primer Spray Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DR1F	Dry filters
DR02	Water-based Paint Spray Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DR2F	Dry filters
DR03	Water-based Paint Spray Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DR3F	Dry filters
DOR01	Water-based Primer Spray Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	AP02	Arrestor Pads
GR01	Water-based PVA Glue Spreader	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	none
WMS0, WM01, EM01, TRE0, TRW0, EMS0	MDF Lineal Molding Lines #1 (including West Rip Saw, West Molder, East Molder, East Trim Saw, West Trim Saw, East Rip Saw)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH03	Baghouse
WMS2, WM02, EM02, TRE2, TRW2, EMS2	MDF Lineal Molding Lines #2 (including West Rip Saw, West Molder, East Molder, East Trim Saw, West Trim Saw, East Rip Saw)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH03	Baghouse
WW02	Door Manufacturing Line (sawing, molding, assembly equipment.)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH05	Baghouse
DR04	Water Based Primer Coating Line	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DR4F	Dry filters

B. Equipment & Rule Applicability

Condition 3.4.1 establishes the 40 percent opacity limit for PM emissions in accordance with Rule 391-3-1-.02(2)(b) which applies to all sources that do not have a more stringent limit. Matter emissions from paint overspray booths are controlled by arrestor pads that capture the overspray. Likewise, particulate matter emissions from the woodworking operations that may result in visible emissions are captured by the baghouses.

Georgia Rule (e), “Particulate Emissions from Manufacturing Processes,” applies to all processes that are not covered by a more specific rule or regulation. This standard applies to all surface coating, drying ovens, and woodworking operations and is incorporated in this permit as Condition No. 3.4.2. Particulate matter emissions from the overspray of paint spray booths are controlled by arrestor pads, and particulate matter emissions from the woodworking operations are abated by the four baghouses.

Georgia Rule (g), “Sulfur Dioxide,” applies to all fuel burning sources. This rule limits the sulfur content of any fuel used at the plant to less than 2.5 percent, by weight, and is incorporated in this permit as Condition No. 3.4.3. Woodgrain Millwork complies with this standard by restricting fuel usage to natural gas, which contains less than 2.5 percent, by weight, sulfur.

The facility was a major source for HAPs when the “National Emission Standards for the Printing and Publishing Industry”, Subpart KK, was promulgated, and EPD had made a past determination that the facility was subject to the NESHAP Subpart KK. However, the Applicability Determination Index (ADI) dated Sept. 23, 2003, indicated that a facility that primarily applies finishing to architectural molding materials is regulated under MACT subpart QQQQ instead of MACT subpart KK. The Division has determined that subpart QQQQ is the prevailing MACT. Since the facility became a synthetic minor before the promulgation date for subpart QQQQ, the facility is not subject to MACT subpart QQQQ.’

Emission and Operating Caps:

None required.

Rules and Regulations Assessment:

Not applicable

C. Permit Conditions

Condition No. 3.4.1: establishes the 40 percent opacity limit for PM emissions in accordance with Rule 391-3-1-.02(2)(b).

Condition No. 3.4.2: establishes Rule 391- 3-1-.02(2)(e) limit on particulate matter emissions.

Condition No. 3.4.3: establishes Rule 391- 3-1-.02(2)(g) limit on sulfur content of fuels for fuel burning sources.

Condition No. 3.5.1 is the work practice standard for handling of VOC-laden materials.

Condition No. 3.5.2 is the work practice standard for VOC-laden materials containers.

Condition No. 3.5.3 was updated to reflect the addition of DR4F. The condition requires that spray booths are controlled by air filters all the time. It also ensures maintenance for paint spray booth filters.

Condition No. 3.5.4 requires PM emissions from the woodworking operations to be controlled by the baghouses BH01 and BH02.

Condition No. 3.5.5: requires PM emissions from MDF Lineal Molding Line to be controlled by Baghouse BH03 at all times during operation.

Condition No. 3.5.6 requires PM emissions from the MDF Molding Lines #2 to be controlled by Baghouse BH03.

Condition 3.5.7 was added to this permit. It requires PM emissions from Door Manufacturing lines WW02 to be controlled by Baghouse BH05.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Not applicable

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires monitoring and recording of pressure drop across baghouses and paint booth filters.

Condition 5.2.2 requires weekly inspection of the baghouses BH01, BH02, BH03 and **BH05** and report if the pressure drop across any of the baghouses falls outside of normal operating ranges. This condition was updated to reflect addition of Baghouse BH05.

Condition 5.2.3 requires weekly inspection of solvent-laden cloth, paper, or any other absorbent applicators used for solvent cleaning and all containers of volatile organic compounds to ensure compliance with work practice in condition 3.5.1 and 3.5.2.

Condition 5.2.4 ensures proper function of the Baghouses BH01, BH02, BH03 and **BH05**. The condition requires daily visible checks for all baghouses at the facility. It updates slightly to reflect the addition of Baghouse BH05.

C. Compliance Assurance Monitoring (CAM)

Not applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

B. Specific Record Keeping and Reporting Requirements

6.2.1 requires from the facility to maintain records of the pressure drop and the replacements of the arrestor pads/filters that control particulate emissions from coating paint booths (Source Codes DS01, FC03, DR01, DR02, DR03, DR04 and DOR01)

Conditions Nos. 6.2.2 requires maintaining monthly usage of all materials containing volatile organic compounds used at the facility.

Condition 6.2.3 requires calculating total monthly volatile organic compound emissions using the records in condition 6.2.2.

Condition 6.2.4 requires calculating twelve-month rolling total VOC emissions for each month from the facility for purposes of PSD avoidance as required by condition 2.1.1.

Condition 6.2.5 requires maintaining monthly usage records of all materials containing hazardous air pollutants (HAPs).

Condition 6.2.6 is a record keeping condition to calculate monthly HAP emissions. The facility is required to notify the Division if emissions of any individual HAP exceed 0.83 tons (10 tons/year divided by 12 months = 0.83 tons) or if emissions of all listed HAPs combined exceed 2.08 tons, during any calendar month (25 tons/year divided by 12 months = 2.08 tons).

Condition 6.2.7 requires calculating the twelve-month rolling total emissions of each listed hazardous air pollutant to enable the facility to avoid applicability to the “National Emission Standards for the Surface Coating of Wood Building Products” as required by Condition 2.1.2.

VII. Specific Requirements

A. Operational Flexibility

Not applicable

B. Alternative Requirements

Not applicable

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not applicable

E. Short-Term Activities

Not applicable

F. Compliance Schedule/Progress Reports

Not applicable

G. Emissions Trading

Not applicable

H. Acid Rain Requirements

Not applicable

I. Stratospheric Ozone Protection Requirements

Not applicable

J. Pollution Prevention

Not applicable

K. Specific Conditions

Not applicable

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//