

Facility Name: **Rentz Cabinet Corp.**
 City: Rentz
 County: Laurens
 AIRS #: 04-13-175-0058

Application #: TV-518940
 Date Application Received: October 20, 2020
 Permit No: 2434-175-0058-V-05-0

Program	Review Engineers	Review Managers
SSPP	Eddie Gomez	Jeng-Hon Su / Hamid Yavari
ISMU	Anna Gray	Dan McCain
SSCP	Kenneth Phillips	Stephen Damaske
Toxics	Kenneth Phillips	Stephen Damaske
Permitting Program Manager		Eric Cornwell

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:

Rentz Cabinet Corporation

2. Parent/Holding Company Name:

Rentz Cabinet Corporation

3. Previous and/or Other Name(s):

No previous names identified.

4. Facility Location:

2041 College Street, Rentz, Laurens County, Georgia 31075

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

The facility is located in an attainment area.

B. Site Determination

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
2431-175-0058-V-04-0	April 21, 2016	Title V Renewal
2431-175-0058-V-04-1	August 5, 2020	Operation of a Spray Booth

D. Process Description

1. SIC Codes(s)

2434 – Kitchen Cabinets Manufacturing

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures kitchen cabinets.

3. Overall Facility Process Description

The facility receives countertop laminate and dried lumber, cuts the wood to the requested specifications, and assembles wood cabinets and countertops. The facility's major operations include the woodworking areas and the finishing line (located in the main production building) and the countertop assembly area (located across the street from the main production building).

Woodworking operations (Emission Unit ID No. WSD1) include saws, drills, lathes, planers, molders, staplers, sanding stations and chippers. These units are located indoors to prevent fugitive emissions. Hoods at each station collect woodwaste. Woodwaste from woodworking operations in the main production building is sent to a dust collection cyclone (Air Pollution Control ID No. CYC1). Woodwaste from the countertops building is sent to cyclone CYC2. The collected waste of the cyclone is landfilled, farmed, or given away for private use.

Wood cabinet parts are assembled to form the counter tops and kitchen cabinets. Two spray guns (Emission Unit ID No. CTA1) are used to apply glue on the countertops in the countertop assembly line. The countertops are air dried and then go through a final assembly and inspection process.

The finishing area consists of four finishing spray booths (Emission Unit ID Nos. FB01, FB02, FB03, and FB04). The first finishing booth (FB01) applies the stain, the second finishing booth (FB02) applies the sealer, and a third finishing booth (FB03) applies the topcoat and/or varnish. FB04 is a fourth spray booth, an automated Cefla Prima spraying machine that performs stain, sealer, and topcoat in multiple passes. The cabinets are air dried and then go through a final assembly and inspection process. The facility uses two natural gas fired ovens for drying the cabinets. Space heaters are utilized throughout the facility. Particulate emissions from the finishing booths are controlled by fiberglass paint arrestor media rolls (spray booth filters).

The facility also operates a dip tank (Emission Unit ID No. DT1) for applying cut sealer to cabinet parts. The dip tank operates off-line from the spray booths in batch mode. Wood is dipped into the tank and drips dry.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility was potentially a major source under PSD/NSR regulations; however, they took a facility wide VOC emission limit to remain a minor source and avoid a PSD/NSR review. The facility previously had a 249 tons per year limit, but they requested a reduction from 249 tpy to 150 tpy in order to reduce annual air permit fees. The facility is a true PSD minor source for all other criteria air pollutants.

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	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓
CO	Yes			✓
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

The facility is a major source for HAPs because its total HAP emissions are greater than 25 tpy and its individual HAP emissions are greater than 10 tpy. Therefore, the facility is subject to 40 CFR 63, Subpart JJ – “National Emission Standards for Wood Furniture Manufacturing Operations.”

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	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility currently operates under a facility-wide VOC emissions limit of 150 tons per year.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility is in compliance with all applicable rules and regulations.

D. Permit Conditions

Condition 2.1.1 establishes a facility-wide VOC emissions limit of 150 tpy for PSD Avoidance purposes.

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
FB01	Finishing Booth No. 1 (stain booth)	40 CFR 63 – Subpart A 40 CFR 63 – Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FT01	Spray Booth Filter
FB02	Finishing Booth No. 2 (sealer booth)	40 CFR 63 – Subpart A 40 CFR 63 – Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FT02	Spray Booth Filter
FB03	Finishing Booth No. 3 (topcoat booth)	40 CFR 63 – Subpart A 40 CFR 63 – Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FT03	Spray Booth Filter
FB04	Finishing Booth No. 4 (coating booth)	40 CFR 63 – Subpart A 40 CFR 63 – Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FT04	Spray Booth Filter
CTG1	Countertop Glue Operations	40 CFR 63 – Subpart A 40 CFR 63 – Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
WSD1	Main Wood Shop	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CYC1	Cyclone
CTA1	Countertop Assembly	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CYC2	Cyclone
DT1	Cut sealer dip tank	40 CFR 63 – Subpart A 40 CFR 63 – Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

There are no equipment related emission or operating caps.

Rules and Regulations Assessment:

The facility is subject to the following Georgia State Rules:

391-3-1-.02(2)(b) Visible Emissions

391-3-1-.02(2)(e) Particulate Emissions from Manufacturing Processes

The facility is subject to the following Federal Standard:

40 CFR Part 63 - Subpart JJ National Emission Standards for Wood Furniture Manufacturing Operations

The facility's spray booths and glue guns (Emission Unit ID Nos. FB01, FB02, FB03, FB04, and CTG1) and off-line sealer dip tank (Emission Unit ID No. DT1) are subject to 40 CFR Part 63 Subpart JJ because the actual combined HAP emissions are greater than 25 tpy and the individual HAP emissions for several HAPs are greater than 10 tpy.

C. Permit Conditions

Condition 3.3.1 states that 40 CFR Part 63 Subparts A and JJ are applicable.

Conditions 3.3.2 specifies the definition of *Volatile Hazardous Air Pollutant* and *as applied* per 40 CFR 63.801.

Condition 3.3.3, 3.3.4, 3.3.6, 3.3.7, and 3.3.8 specify the Part 63 Subpart JJ emission standards for the various finishing materials used in the spray booths.

Condition 3.3.5 specifies the compliance method for Condition Nos. 3.3.3 and 3.3.4 per 40 CFR 63.802(a)(1) and 40 CFR 63.804(a). Thinners have been removed from Condition 3.3.5.b per 40 CFR 63.804(a)(1).

Condition No. 3.3.9 limits formaldehyde emissions in accordance with 40CFR63.802(a)(4).

Condition Nos. 3.3.10, 3.3.11, and 3.3.13 specify the requirements of 40 CFR 63.803

Condition 3.3.12 specifies the use of conventional air spray guns in accordance with 40CFR 63.803(h)

Condition 3.4.1 specifies the visible emissions limit in accordance with Georgia Rule 391-3-1-.02(2)(b)

Condition 3.4.2 specifies the allowable particulate matter in accordance with Georgia Rule 391-3-1.02(2)(e).

Condition 3.5.1 specifies the frequency of replacing spray booth filters in accordance with Georgia Rule 391-3-1-.02(2)(a)10.

Condition 3.5.2 requires the Permittee to provide the manufacturer specifications for recommended pressure drops for each spray booth filter.

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 includes frequency of monitoring pressure drop across each spray booth.

Condition 5.2.2 includes frequency of inspections for adverse conditions in the interior or exterior of each cyclone.

Condition 5.2.3.a includes the requirements for the operator training course in accordance with 40 CFR 63.803(b).

Condition 5.2.3.b includes the requirements for the inspection and maintenance plan in accordance with 40 CFR 63.803(c).

Condition 5.2.3.c specifies the requirements for the cleaning and washoff solvent accounting system in accordance with 40 CFR 63.803(d).

Conditions 5.2.3.d through g include requirements for enforcement of Conditions 3.3.10, 3.3.11, and 3.3.12.

Condition 5.2.3.h includes requirements for control of HAP solvents in accordance with 40 CFR 63.803(i) and

Condition 5.2.3.i includes requirements for control of emissions from washoff operations in accordance with 40 CFR 63.803(k).

Condition 5.2.3.j specifies a formulation assessment plan in accordance with 40 CFR 63.803(l).

Condition 5.2.3.k specifies the recordkeeping for formaldehyde content in accordance with 40 CFR 63.806(b)(4).

C. Compliance Assurance Monitoring (CAM)

The requirements of 40 CFR Part 64 are not applicable to the main wood shop cyclone because pre-controlled PM10 emissions are less than 100 tpy. The requirements of Part 64 do not apply to the remainder of the facility.

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 semiannual basis.

Condition 6.1.7 includes the exceedances reporting requirements for 40 CFR 63 Subpart JJ.

Condition 6.1.7.b.vi and 6.1.7.b.vii include the compliance options referenced in Permit Condition 3.3.5.a and 3.3.5.b respectively.

Condition 6.1.7.b.xi sets requirements for the formaldehyde limit.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.3 specifies that the Permittee is not required to keep track of VOCs and/or VHAPs disposed of in waste unless they take credit for such disposal as part of the tracking of facility-wide VOC emissions.

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.