

From: [Susan Jablonski](#)
To: [REDACTED]
Cc: [OCE](#); [Oscar Rodriguez](#); [LINDSEY RENFRO](#); [Michelle Harris](#); [Rosalind Stockton](#); [George Ortiz](#)
Subject: RE: Enforcement Discretion Response - Nation's Cabinetry, LLC; CN605051838; RN100542828; NSR Permit No. 43104
Date: Thursday, March 26, 2020 2:31:18 PM
Attachments: [image001.png](#)

Natasha J. Martin, Attorney
Nations Cabinetry, LLC
401 Congress Avenue, Suite 2700
Austin, Texas 78701

Re: Request for Enforcement Discretion – Nations Cabinetry, LLC; CN605051838; RN100542828; NSR Permit No. 43104, NSR Air Permit No. 43104 Renewal Application and Recordkeeping requirements Special Conditions Nos. 5 and 10(F)

Dear Ms. Martin:

This is in response to your request dated March 25, 2020, requesting an extension for the NSR Air Permit renewal application and stain booth filter recordkeeping requirements. The TCEQ is exercising enforcement discretion on a case by case base for regulated entities that are experiencing staffing shortages due to the COVID-19 pandemic. The issues you outline in your request are issues we would consider granting enforcement discretion. Due to the limited availability of staff and the strain of Nations resources, your request is approved. This correspondence will serve as authorization for that request. A 60-day extension is granted for enforcement discretion until, May 25, 2020.

If you or members of Nations' staff have any questions, please feel free to contact Mr. George Ortiz at (210) 403-4030.

Sincerely,

Susan Jablonski,
P.E.
Area Director for Central Texas
Texas Commission on Environmental Quality
(512) 239-6731

From: Natasha J. Martin <>
Sent: Wednesday, March 25, 2020 3:23 PM
To: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: OCE <OCE@tceq.texas.gov>; Oscar Rodriguez <[REDACTED]> LINDSEY RENFRO <[REDACTED]>
Subject: TCEQ - Enforcement Discretion - Nation's Cabinetry, LLC; CN605051838; RN100542828; NSR Permit No. 43104

Deputy Garcia –

In accordance with TCEQ's temporary enforcement discretion policy due the novel coronavirus ("COVID-19"), I am submitting this enforcement discretion request on behalf of Nations Cabinetry, LLC ("Nations"). With the COVID-19 crisis impacting public health and safety, business, and commerce, Nations has experienced some strain on its resources. Nations would like to request enforcement discretion for the two issues described below.

1. Prior to the onset of business interruption from COVID-19, Nations was preparing to submit an amendment/renewal application for a portion of its coating line operation at the Zee Manufacturing Plant, located at 4600 West US Highway 90, San Antonio, Texas 78237. The amendment application would be a corrective step for an alleged violation of Tex. Health & Safety Code Sec. 382.051(a) for the coating line. Nations has previously sought to authorize this equipment on three separate attempts. Each prior application was voided. Nations is currently addressing the TCEQ's unanswered questions in an effort to submit a complete application but is experiencing delay due to COVID-19. The TCEQ previously extended Nation's deadline to submit its renewal application to May 1, 2020. Nations is respectfully requesting enforcement discretion until then.

2. As a result of COVID-19, Nations has limited staff available to conduct certain recordkeeping requirements. NSR Permit No. 43104 (the "Permit") applies to the operations at the above-referenced. See Permit attached. Special Condition nos. 5 and 10(F) require records of the stain booth filter changes at the end of every work shift. Although Nations is doing its best to meet these requirements, it is possible that there may not be records of filter changes for each shift due to staffing issues related to COVID-19. Given the uncertainty with the spread of the virus, it is difficult to determine when staffing will not be an issue. For the near term, Nations is respectfully requesting enforcement discretion until May 31, 2020. Nations reserves the right to update this projection based on guidance from public health officials.

Nations fully expects to comply with all local, state, and federal environmental laws, and is attempting to correct these issues expeditiously. Nations appreciates the opportunity to work with the TCEQ on compliance and any discretion that the TCEQ can provide at this time. Please contact me if you or the OCE staff have any questions.

Best regards,

Natasha J. Martin | Attorney

██████████ | Office 512 480 5639 | Cell 512 965 5319
401 Congress Avenue, Suite 2700 | Austin, TX 78701



www.gdhm.com | [Bio](#) | [LinkedIn](#)



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Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



Craig.R

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

July 1, 2010

MR DONNIE ZAPARA
VICE PRESIDENT
ZEE MANUFACTURING LTD
4600 W US HWY 90
SAN ANTONIO TX 78237-4002

Re: Permit Renewal
Permit Number: 43104
Wood Cabinet Manufacturing Facilities
San Antonio, Bexar County
Regulated Entity Number: RN100542828
Customer Reference Number: CN601490808
Account Number: BG-1199-P

Dear Mr. Zapara:

This is in response to your application Form PI-1R (General Application for Air Permit Renewals) concerning the proposed renewal of Permit Number 43104.

As indicated in Title 30 Texas Administrative Code § 116.314(a) [30 TAC § 116.314(a)], and based on our review, Permit Number 43104 is hereby renewed. Enclosed is a new permit for your facility. It contains special conditions and a maximum allowable emission rates table (MAERT). We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met. This permit will be in effect for ten years from the date of approval (Commission's final decision). If this permit is appealed and the permittee does not commence any action authorized by this permit during judicial review, the term will not begin until judicial review is concluded.

Planned maintenance, startup, and shutdown emissions have been previously reviewed, authorized, and included in the MAERT. Any other maintenance activities are not authorized by this permit and will need to obtain a separate authorization.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

Mr. Donnie Zapara

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July 1, 2010

Re: Permit Number 43104

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Thank you for your cooperation in sending us the information necessary to evaluate your operations and for your commitment to air pollution control. If you need information or have any questions, please contact Mr. Craig Richardson at (512) 239-1309 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Donnie Zapara

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July 1, 2010

Re: Permit Number 43104

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/CR/pg

Enclosures

cc: Air Section Manager, Region 13, San Antonio
Sanitarian Services Manager, Food and Environment Division, San Antonio Metropolitan
Health District, San Antonio
Mr. Robert Osborn, Consultant, Source Environmental Sciences, Inc., Houston

Project Number: 154419



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT



A PERMIT IS HEREBY ISSUED TO
Zee Manufacturing, Ltd.
AUTHORIZING THE CONTINUED OPERATION OF
Wood Cabinet Manufacturing Facilities
LOCATED AT San Antonio, Bexar County, Texas
LATITUDE 29° 38' 35" LONGITUDE 098° 35' 38"

1. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. This permit may be appealed pursuant to 30 TAC § 50.139.
12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
14. **Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.**

PERMIT 43104

Date: July 1, 2010

For the Commission

SPECIAL CONDITIONS

Permit Number 43104

1. This permit authorizes facilities associated with wood cabinet manufacturing at 4600 U.S. Highway 90 West in San Antonio. It does not cover permits by rule for machinery and equipment cleanup (Registration No. 53421), and the miscellaneous item/touch-up spray coating booth (Registration Number 74161).

EMISSION LIMITATIONS

2. Opacity of particulate matter (PM) emissions shall not exceed 5 percent from the exhaust stacks. This determination shall be made first by observing for visible emissions. Observations shall be made during normal operations at least 15 feet and no more than 0.25 mile from each of the stacks. If visible emissions are observed from the stacks, then opacity shall be determined by Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Contributions from uncombined water shall not be included in determining compliance with this condition. If opacity exceeds 5 percent, corrective action to reduce the opacity shall be taken promptly. Observations shall be performed and recorded quarterly.
3. Title 40 CFR Part 63, Subpart JJ applies to the wood cabinet manufacturing facilities.

OPERATIONAL LIMITATIONS

4. Coating lines shall be fully automated to include automatic high-efficiency spray application equipment.
5. The stain and topcoat/sealer booths shall be exhausted only through dry filters and a water scrubber, respectively, each with minimum 95 percent efficiency in the removal of total PM from the exhaust streams. The stain booth filters shall be replaced with new filters at the end of every work shift and the water scrubber shall be inspected for proper operation each work shift. The filter changes and water scrubber inspections shall be documented.
6. The emissions from the coating lines shall be controlled by a regenerative thermal oxidizer (RTO) with 100 percent collection and a minimum 95 percent destruction efficiency, except during periods of oxidizer bypass for maintenance and other activities.

SPECIAL CONDITIONS

Permit Number 43104

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- A. The RTO combustion chamber temperature shall be maintained at a three-hour average temperature of at least 1500 degrees Fahrenheit. It shall be equipped with a monitor that continuously measures and records the combustion chamber temperature. The three hour average temperature shall be calculated over four equally spaced measurement points per hour. The thermocouples used to measure temperature in the RTO combustion chamber shall be replaced at least once annually.
- B. The RTO shall not be operated in bypass mode during coating application in the miscellaneous item/touch-up spray booth. The bypass shall be inspected at least once a month to ensure the valves are operating properly.
- 7. The wood shop shall be exhausted only through a baghouse with a loading efficiency of a nominal 0.0012 grain of wood dust per cubic foot of air in the exhaust stream. A maximum pressure drop of 4.5 inches shall be maintained as measured by a manometer.
- 8. Exhaust stacks shall have no restrictions or obstructions to their vertical discharge. Minimum stack heights above ground-level shall be:

<u>EPN</u>	<u>Height (ft.)</u>
RTO	25
1 and 2	45
3 and 4	35

- 9. New/different coating materials may be used provided that all of the following criteria are satisfied:
 - A. The new material shall serve the same basic function as the current material, and the emissions shall be emitted from the same EPN as the current material.
 - B. The total makeup of the new material is known (weight percentages of the ingredients in material add to 100 percent or more).
 - C. There is no increase in the annual emission rates from EPNs RTO and 1, 2, 3, and 4.
 - D. Each new air contaminant ingredient meets the following criteria:
 - (1) It is emitted at a rate and has short-term and annual Effects Screening Levels (ESL) as stated in the following table:

SPECIAL CONDITIONS

Permit Number 43104

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Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}^3$)	Annual ESL ($\mu\text{g}/\text{m}^3$)
≤ 0.04	≥ 2 and < 500	≥ 0.2 and < 50
≤ 0.10	≥ 500 and $< 3,500$	≥ 50 and < 350
≤ 0.40	$\geq 3,500$	≥ 350

AND/OR

- (2) The following criteria are satisfied (new glue air contaminants shall not be allowed to be evaluated using the criteria):

$$E_i \times 11.36 \text{ ug}/\text{m}^3/\text{lb}/\text{hr} \leq \text{ESL}_i, \text{ and}$$

$$E_i \times 11.36 \text{ ug}/\text{m}^3/\text{lb}/\text{hr} \times 0.08 \times (T/8760) \leq \text{Annual ESL}$$

where:

E_i = The ER in lb/hr of a single air contaminant ingredient in a new material is proposed to be used on either or both coating lines.

ESL_i = The short-term ESL in $\mu\text{g}/\text{m}^3$ in effect at the time the new single aircontaminant ingredient is introduced as listed in the most current Texas Commission on Environmental Quality (TCEQ) ESL list or as specifically derived by the TCEQ Toxicology Division.

T = The number of hours per year a single air contaminant ingredient in a new material is proposed to be used on either or both coating lines.

Annual ESL = The long-term ESL in $\mu\text{g}/\text{m}^3$ in effect at the time the new single air contaminant ingredient is introduced as listed in the most current Texas Commission on Environmental Quality (TCEQ) ESL list or as specifically derived by the TCEQ Toxicology Division.

SPECIAL CONDITIONS

Permit Number 43104

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RECORDKEEPING

10. General Condition No. 7 regarding information and data to be maintained on file is supplemented as follows and shall be used to demonstrate compliance with Special Condition Nos. 2, 5, 6, and 9 and the maximum allowable emission rates table:
 - A. Environmental Data Sheets or Material Safety Data Sheets for coatings and associated materials in use.
 - B. Volatile hazardous air pollutant content of coatings and related materials in kg/kg solids.
 - C. Actual daily hours of coatings operations, daily usage of coatings and associated materials in gallons each for controlled and uncontrolled operations, and monthly usage of glue in gallons.
 - D. Monthly record of:
 - (1) The VOC and PM emissions from EPN RTO and EPN 1, 2, 3, and 4 in lb/hr as a daily average and from EPN RTO and 1, 2, 3, and 4 in tons per year (tpy) for the rolling 12 previous months.
 - (2) The VOC emissions from EPN 8 in lb/hr as a monthly average and in tpy for the rolling previous 12 months.
 - (3) Hazardous air pollutant (HAP) emissions from all sources for each individual HAP and for all HAPs in tpy for the rolling 12 previous months.
 - E. Records of visible emissions/opacity observations.
 - F. Records of stain booth filter changes and water scrubber inspections.
 - G. RTO temperature recordings, 3-hour averages, and thermocouple replacement documentation.
 - H. Records of RTO bypass inspections.
 - I. Records of substitution/addition of new materials showing how Special Condition No. 9 is satisfied to include:

SPECIAL CONDITIONS

Permit Number 43104

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- (1) Identification of each air contaminant, its hourly emission rate, its short and long-term ESLs, the number of hours per year it will be used, and the date it was introduced, and
- (2) From the date the air contaminant was introduced forward, a monthly report shall be prepared that shows the hours per year it has been used on a rolling 12-month basis to demonstrate compliance with the hours per year used in demonstrating the annual ESL was not exceeded.

J. Report of successful thermal oxidizer testing conducted in November 2006.

POLLUTION PREVENTION

11. All coatings spills shall be cleaned up immediately.
12. All coatings waste material shall be stored in sealed containers until removed from the site in accordance with applicable regulations.
13. Towels, rags, or other absorbent materials used for coating cleanup operations shall be placed into sealed containers immediately after use and shall be kept in storage until removed from the site by an authorized disposal service.
14. Residue collected in the dust collector shall be handled, stored, and disposed of in such a manner which will minimize the amount becoming airborne.

Dated July 1, 2010

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 43104

This table lists the maximum allowable emission rates for all sources of air contaminants covered by this permit. The emission rates shown are those derived from information submitted in the application for permit renewal and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name	Air Contaminant Name (2)	Emission Rates	
			lb/hr	TPY (3)
RTO	Stain Booth with Dryer and Topcoat/Sealer Booth with Dryers vented through a 6.0 MMBtu/hr Thermal Oxidizer	VOC and ES	8.46	
		VOC (4)	0.03	0.02
		PM/PM ₁₀ (4)	0.05	0.02
		NO _x	0.59	0.21
		CO	0.50	0.18
		SO ₂	<0.01	0.02
1, 2, 3, and 4	Stain Booth with Dryer and Topcoat/Sealer Booth with Dryers vented uncontrolled	VOC and ES	167.00	
		PM/PM ₁₀	0.65	
RTO 1, 2, 3, and 4	Booths and Dryers Controlled and Uncontrolled	VOC and ES		40.00
		PM/PM ₁₀		2.85
5	3.5 MMBtu/Hr Boiler	VOC	0.02	0.09
		PM/PM ₁₀	0.03	0.11
		NO _x	0.34	1.50
		CO	0.29	1.27
		SO ₂	<0.01	0.01
6	5.5 MMBtu/Hr Makeup Air Heater	VOC	0.03	0.13
		PM/PM ₁₀	0.04	0.18
		NO _x	0.54	2.37
		CO	0.45	1.99
		SO ₂	<0.01	0.01
7	Wood Shop and Coating Preparation vented through a Baghouse	PM/PM ₁₀	0.69	3.03

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name	Air Contaminant Name (2)	Emission Rates	
			lb/hr	TPY (3)
8	Wood Shop Glue and Space Heater Fugitives	VOC	3.64	1.82
		VOC (4)	0.01	0.02
		PM/PM ₁₀	0.01	0.03
		NO _x	0.09	0.41
		CO	0.04	0.18
		SO ₂	<0.01	<0.01
9	Valve, Connection, and Flange Fugitives	VOC	0.02	0.06
RTO, 1, 2, 3, 4, 5, 6, 7, 8, and 9	All Sources	Each HAP		3.92
		All HAP		13.03

(1) Emission point identification from plot plan.

(2) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

ES - exempt solvent as defined in Title 30 Texas Administrative Code § 101.1

PM - total particulate matter, suspended in the atmosphere, including PM₁₀

PM₁₀ - particulate matter, equal to or less than a nominal 10 microns in aerodynamic diameter, including PM_{2.5}

PM_{2.5} - particulate matter, equal to or less than a nominal 2.5 microns in aerodynamic diameter

NO_x - oxides of nitrogen

SO₂ - sulfur dioxide

CO - carbon monoxide

HAP - hazardous air pollutant as identified in Title 40 Code of Federal Regulations Part 63, Subpart C

(3) Rate is for a rolling 12-consecutive months.

(4) Product of combustion.

Dated July 1, 2010

Permit Renewal Source Analysis & Technical Review

Company	Zee Manufacturing, Ltd.	Permit Number	43104
City	San Antonio	Project Number	154419
County	Bexar	Account Number	BG-1199-P
Project Type	Renewal	Regulated Entity Number	RN100542828
Project Reviewer	Mr. Craig Richardson	Customer Reference Number	CN601490808
Site Name	Wood Cabinet Manufacturing		

Project Overview

The company proposes to revise emissions from gas line connections in the plant (EPN 9) based on the most recent TCEQ equipment leak fugitive emission guidance and to renew its permit.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM/PM ₁₀	6.22	6.22	0.00
VOC	42.54	42.14	-0.40
NO _x	4.49	4.49	0.00
CO	3.62	3.62	0.00
SO ₂	0.05	0.05	0.00
HAPs	3.92/13.03	3.92/13.03	0.00

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	3/23/10
Compliance period:	2/5/10 - 2/6/05
Site rating & classification:	0.27 Average
Company rating & classification:	0.27 Average
Has the permit changed on the basis of the compliance history or rating?	No

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement	
39.403	Date Application Received:	2/5/10
	Date Administratively Complete:	2/16/10
	Small Business Source?	No
	Date Leg Letters mailed:	2/16/10
39.603	Date Published:	3/11/10
	Publication Name:	<i>Conexion</i>
	Pollutants:	Organic compounds ,PM, NO_x, CO, and SO₂
	Date Affidavits/Copies Received:	3/26/10
	Is bilingual notice required?	Yes
	Language:	Spanish
	Date Published:	3/14/10
	Publication Name:	<i>La Prensa de San Antonio</i>
	Date Affidavits/Copies Received:	3/26/10

Permit Renewal
Source Analysis & Technical Review

Permit No. 43104
Page 2

Regulated Entity No. RN100542828

Rule Citation	Requirement	
	Date Public Notice Verification Form Received:	3/26/10
39.604	Public Comments Received?	No
	Hearing Requested?	No
	Meeting Request?	No
	Is 2nd Public Notice required?	No
39.419	If no, give reason:	No Notice and Comment Hearing request and permit not a PAL

Renewal Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.315(a)	Date of permit expiration:	5/16/10
116.310	Date written notice of review was mailed:	11/12/09
116.315(a)	Date application for Renewal (PI-1R) received:	2/5/10
116.311(a)(1)	Do dockside vessel emissions associated with the facility comply with all regulations?	N/A
116.311(a)(2)	Is the facility being operated in accordance with all requirements and conditions of the existing permit, including representations in the application for permit to construct and subsequent amendments, and any previously granted renewal, unless otherwise authorized for a qualified facility?	Yes
116.311(a)(3)	Subject to NSPS?	No
116.311(a)(4)	Subject to NESHAPS?	No
116.311(a)(5)	Subject to NESHAPS (MACT) for source categories? Subpart: JJ (even though the site is not a major source of HAP, facilities are subject to MACT due to EPA "once in, always in" policy)	Yes
116.311(a)(6)	Does this project require case-by-case MACT?	No
116.311(b)	Was there a condition of air pollution that had to be addressed during this project review?	No
116.314(a)	Does the facility meet all permit renewal requirements?	Yes
116.313	Permit Renewal Fee: \$ 2,175.56 Fee certification:	Yes
	Applicable Outstanding Fees:	No

Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement	
122.10(13)	Title V applicability: N/A - company does not have a FOP	
122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	No
	Does the site emit 10 tons or more of any single HAP?	No
	Does the site emit 25 tons or more of a combination?	No
122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	No
122.10(13)(D)	Is the site a non-attainment major source?	No
122.602	Periodic Monitoring (PM) applicability: N/A; however, monitoring for visible emissions and of the operating parameters of the thermal oxidizer, dry and water coating booths, and wood working baghouse will be conducted.	
122.604	Compliance Assurance Monitoring (CAM) applicability: N/A; not a Title V source	

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Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	13	Edgar Sawyer Jeanette Salazar	None (site review) Spell out exempt solvent on MAERT (draft permit)
City:	San Antonio	No response	(site review and draft permit)
County:	N/A		
Comment resolution:			Exempt solvent spelled out

Process Description

Wood cabinet manufacturing consists of milling, sanding, and finishing:

- A. Milling -Plywood is cut to size with saws. Sawdust is removed by vacuum to a 67,200 cfm dust collector with cartridge filter.
- B. Sanding -Assembled cabinets are sanded with orbital and edge sanders. Sawdust is removed by vacuum to the dust collector.
- C. Finishing -This is accomplished on two automated lines with progressive drying systems. Cabinets that require stain, sealer and topcoat go through both lines; cabinets that do not require stain are only sent through the latter. On both lines the cabinets are mechanically conveyed and pass through a dust extractor that is vented to the dust collector. Stains, paints and thinner are stored in the booths on the lines and pumped directly to the application systems.
 - (1) On the stain line, cabinets pass through the stain booth which is equipped with HEPA dry filters (minimum 95% efficiency) and in which stain is applied by high-efficiency automatic spray guns. Emissions are captured and vented through a regenerative thermal oxidizer (RTO) or at times uncontrolled. Afterward, the cabinets move to a wipe and touch-up station and on through a hot air drying system which are also exhausted through the RTO or uncontrolled.
 - (2) Cabinets processed through the second line enter the automated coating booth for either sealer or topcoat depending on the stage of the finishing process. The booth is equipped with automated carousel-mounted high efficiency spray guns and a 95% efficient water filtration system. Emissions are also vented through the RTO or uncontrolled. Next, the cabinets move in-turn through a hot air curing oven emissions from which are exhausted through the RTO or uncontrolled, two additional curing ovens each with a stack, through an auto sanding and denibbing machine, and finally to manual sanding and touch-up prior to topcoat application. The same procedure for topcoat is used as described above for sealer.
 - (3) After the cabinet parts are dry, they are assembled and prepared for shipment.

Make-up air for the booths is supplied using a gas-fired heater and hot air for the drying/curing ovens is provided by a gas-fired boiler.

Pollution Prevention

Automated conventional spray guns and coating VOC content that meets Chapter 115 limits for wood products coatings

Sources

The milling and sanding done throughout the manufacturing are the source of PM emissions; the application of spray coating is the source of VOC and PM emissions; the RTO, heaters, drying ovens, and boiler are sources of natural gas combustion emissions; and glue used in assembly is the source VOC emissions.

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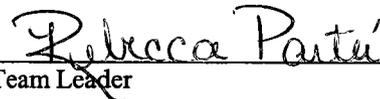
Controls

Dust collector with outlet grain loading less than 0.01 grain/scf for PM from woodworking; 95% efficient water and dry filters for PM from coating overspray; and a RTO with 100% collection and minimum of 95% destruction of VOC from coating facilities.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Robert Osborn (consultant)
Date of contact:	5/27/10
Other permit(s) or permits by rule affected by this action:	None

 6/25/10
Project Reviewer Date

 6-25-10
Team Leader Date