COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Northern Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Masco Cabinetry, LLC. - Merillat Culpeper Plant
641 Maddox Drive, Culpeper, Culpeper County, Virginia
Permit No. NRO-40728

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Masco Cabinetry, LLC. has applied for a Title V Operating Permit for its facility in Culpeper County, Virginia. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: Alireza Khalilzadeh Date: January 23, 2015

Alireza Khalilzadeh
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Air Permit Manager: James B. LaFratta Date: 1/23/15

James B. LaFratta

Regional Director: Thomas A. Faha Date: 1-23-15

Thomas A. Faha

PEA 1/23/2015 AK

FACILITY INFORMATION

Permittee
Masco Cabinetry, LLC.
P.O. Box 1387
Culpeper, VA 22701

Facility
Masco Cabinetry - Merillat Culpeper Plant
641 Maddox Drive
Culpeper, Virginia 22701

County-Plant Identification Number: 51- 047-00032

SOURCE DESCRIPTION

NAICS Code 337110/SIC Code 2434 - Wood kitchen and bath cabinet manufacturing

Masco Cabinetry, LLC. - Merillat Culpeper Plant manufactures kitchen and bath wood cabinets and frame components by woodworking, coating/finishing and assembly operations.

The woodworking equipment includes saws, borers, routers, sanders, and shaping machines used on previously milled wood. Sanding machines are used for final preparation of the assembled components prior to the finishing operations. Dust from the woodworking operation is collected by a dust collection system with ductwork connected to a common fabric filter baghouse.

The finishing system consists of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. Dust from the brush and wipe sanding areas is collected by small dust collection systems with the air returned to the building. High-volume low pressure (HVLP) or equivalent spray guns are used to apply toners, stains, sealers, and topcoats. Currently, there are 11 booths with 71 spray guns. Low temperature ovens operated in the range of 150°F dry the stain. The finishing operations are subject to National Emission Standards For Hazardous Air Pollutants (NESHAP) for wood furniture manufacturing operations, 40 CFR 63, Subpart JJ. After the finishing process, the wood cabinets are assembled, packaged, and stored for shipment.

The facility is a Title V major source of volatile organic compounds (VOC) and hazardous air pollutants (HAPs). Their initial Title V permit was issued on October 26, 2009. This source is located in an attainment area for all pollutants, and is a PSD synthetic minor source. The facility also operates under a Minor NSR Permit issued March 7, 2005, as amended on May 28, 2014.

Merillat was originally registered with the Department of Environmental Quality (DEQ) in 1983 as a wood cabinet assembly plant involving gluing operations only and no process emissions. In 1984, the facility added a sawing operation with a baghouse venting inside the building. In 1997, an 800 ekW emergency generator was installed, but with the 11/24/99 permit amendment, the classification was changed to emergency/peak shaving. On November 24, 1999, the facility was issued a state major new source review (NSR) permit to construct and operate up to fourteen spray booths for their finishing operations, subjecting the facility to 40 CFR 63, Subpart JJ. The permit was amended on December 22, 2000, to allow an increase in the engine-generator operating hours. That mnsr permit was superseded on March 7, 2005, to allow for the addition of woodworking equipment. Finally, there was a minor amendment issued on May 28, 2014, to remove the diesel generator, remove conditions previously met and update conditions based on changes to MACT subpart JJ for Wood Furniture Manufacturing Operations.

The facility commenced operation of the finishing process in 2005, prompting submittal of the initial Title V permit application. The DEQ issued their initial Title V permit on October 26, 2009. On April 9, 2014, Masco Cabinetry, Merillat Culpeper Plant submitted their Title V renewal application, which was received by DEQ on April 10, 2014. Since the application was submitted six months prior to their initial Title V permit expiration, the facility can continue to operate under the Title V application shield until the renewal permit is issued.

Masco Cabinetry, LLC. - Merillat Culpeper Plant participates in the Virginia Environmental Excellence Program (VEEP) and is an Exemplary Environmental Enterprise (E3) member.

COMPLIANCE STATUS

The facility normally undergoes a full compliance evaluation biennially. The most recent FCE, including a site visit, was conducted on October 28, 2014. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Woodworking Operations							
W1	BHS1	Miscellaneous Woodworking Equipment (saws, borers, routers, sanders, shaping and carving machines, etc) and wood dust collection systems with baghouse. Constructed in 2005.	2,200 Cabinets Per day	Waltz Hoist Dustar baghouse Model 12-816-12612	BH1	PM PM-10	3/7/05, amended 5/28/14
Finishing Operations							
F1	FS1-x (multiple stacks)	Up to fourteen coating booths with conveyor systems; Two off-line coating booths; One paint spray booth; one wood brushing system; one sanding system, natural gas fired curing ovens total combined rated capacity of 5 mmbtu/hr; flash-off and cooling tunnels. Constructed in 1999. Commenced Operation in 2005.	193 Cabinets Per hour	Spray booths: fiberglass filters or equivalent and High Volume Low Pressure (HVLP) or equivalent spray guns	N/A	PM VOC HAPS	3/7/05, as amended 5/28/14

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2013 annual emission statement/update is attached (Attachment A). Emissions are summarized in the following tables and represent data from DEQ emissions inventory. There are minor differences with the emission statement from the source, but are considered negligible.

2013 Actual Emissions

	2013 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
GEN1: generator Shutdown in 2014	0.003	0.015	0.005	0.001	0.085
W1:Woodworking	---	---	---	0.778	---
F1: Coating Operations	162.450	---	---	0.343	---
F1: Curing Ovens, Make-up Air units, Heaters	0.506	7.728	0.055	0.699	9.200
TOTAL	162.959	7.743	0.060	1.821	9.285

2013 Facility Hazardous Air Pollutant Emissions

Pollutant	2013 Hazardous Air Pollutant Emission in Tons/Yr
Ethyl Benzene	2.648
Formaldehyde	0.043
Methyl Isobutyl Ketone	0.601
Methanol	2.044
Toluene	8.182
Xylenes	11.341
Other	0.286
TOTAL	25.145

EMISSION UNIT APPLICABLE REQUIREMENTS - Woodworking Operations (W1)

Limitations

The following limitations are state BACT requirements from the NSR permit issued on March 7, 2005, as amended on May 28, 2014 (referred to as 5/28/14 Permit). See Attachment B.

Condition 1: Requires particulate emissions from the saw board operation to be exhausted within the manufacturing building (through a fabric filter control device). (Condition 2 of 5/28/14 Permit)

Condition 2: Requires particulate emissions from the woodworking and machining operation to be controlled by baghouses.
(Condition 4 of 5/28/14 Permit)
The central 90,000 acfm baghouse, Waltz Hoist Dustar model 12-816-12612, controls wood dust emissions from most of the woodworking operation. However, the panel saw has its own internal baghouse that exhausts inside the building, and there are also individual process units with small, internal dust collection units.

Condition 3: Requires fugitive particulate emissions from wood handling to be controlled by complete enclosures or covering conveyors.
(Condition 3 of 5/28/14 Permit)

Condition 4: Sets short-term and annual emission limits for PM_{10} from the woodworking and machining baghouse dust collection systems. Compliance with the annual emission limit is based on the production of cabinets using a DEQ-approved particulate emission factor of 0.4 pounds per cabinet and 99% control efficiency for the baghouse. The permittee is required to keep monthly records on cabinet production, emission calculations and also keep records to show proper operation, maintenance and operator training, as required in Condition 27.
(Condition 7 of 5/28/14 Permit)

Condition 5: Sets a visible emission limit of 5% opacity from the exhaust of each woodworking and machining operation.
(Condition 8 of 5/28/14 Permit)

Condition 6: Requires the development of a maintenance schedule, and inventory of spare parts for air pollution control equipment, written operating procedures for air pollution

control equipment, and for operators to be trained in the proper operation of that equipment.
(Condition 36 of 5/28/14 Permit)

Monitoring

Dust from the woodworking operations is collected in a dust collection system which is vented to a common fabric filter baghouse (BH1). Particulate emissions vented through a properly operating control device should ensure that the particulate matter emission limitation of 0.01 gr/dscf is met. Visible emissions from the exhaust stack may indicate a maintenance problem. Differential pressure monitor readings may indicate a potential problem with the bags.

Condition 7: Requires monitoring of the differential pressure drop across the baghouse.
(Condition 5 of 5/28/14 Permit)

Condition 8: Requires daily observation of the monitoring device used to measure the differential pressure drop.
(Condition 6 of 5/28/14 Permit)

Compliance Assurance Monitoring (CAM) Applicability

The facility identified the baghouse as subject to CAM requirements upon renewal of the Title V permit. As with their initial Title V permit, the source plans to conduct daily visible emission observations of the baghouse exhaust to meet CAM for the control device. The DEQ has determined that the woodworking equipment meets all the requirements of CAM applicability since the uncontrolled emissions of particulate matter from the woodworking equipment (W1) can exceed 100 tons per year, the equipment is subject to emission limits, and add-on control equipment (fabric filter BH1) is used to achieve those emission limits. However, as part of CAM, there are additional requirements.

The full CAM plan for the fabric filters (Attachment C) includes the following indicators:

Indicators 1 and 2 - Visible emissions were selected as a performance indicator because they are indicative of good operation and maintenance of the fabric filter baghouse (BH1). When the baghouse is operating properly, there will not be any visible emissions from the exhaust (Indicator 1). Any visible emissions indicate reduced performance of the particulate matter control device. Therefore, the presence of visible emissions is used as a performance indicator. An excursion is defined as the presence of visible emissions, unless the facility chooses to conduct a Method 9 VEE, where an excursion is defined as an average opacity of five percent during any six-minute period in any hour (Indicator 2). Corrective action shall be taken to

resolve any visible emission excursions. Regardless of which option the facility chooses, a Quality Improvement Plan (QIP) shall be developed if three excursions occur in a two-week period.

Indicator 3 - Monthly external baghouse inspections and annual internal baghouse inspections are required to be conducted by qualified personnel. Inspections will alert the facility of bag deterioration, leaks, structural and component problems to be repaired. The necessary corrective maintenance shall be performed to obtain the proper control efficiencies in order to meet the emission limitations. Records shall be kept on the inspections and maintenance conducted. An excursion in this Indicator is defined as failure to perform monthly or annual inspections of the fabric filter baghouse (BH1).

Conditions 9-16, 18, and 22 are standard Conditions that were added to the DEQ Title V boilerplate for facilities subject to CAM, and are based on 40 CFR Part 64, *Compliance Assurance Monitoring.*

Recordkeeping

The permit includes requirements for recordkeeping necessary to demonstrate compliance with the permit.

Condition 17: Requires recordkeeping for annual number of cabinets produced, annual PM10 emission calculations, operation and control device monitoring records for baghouses, scheduled and unscheduled maintenance, operator training and baghouse design efficiency.
(Condition 10 of 5/28/14 Permit)

Condition 18: Records shall be kept as required for the baghouse to meet the CAM Plan for monitoring performance data (visible emission observations), inspection and maintenance of baghouse components, corrective actions taken to ensure proper equipment operation and to implement the quality improvement plan (QIP).

Testing

Condition 19: The permit does not require a source test. The DEQ and EPA have authority to require testing not included in the permit, if necessary to determine compliance with an emission limit or standard.
(Condition 18 of 5/28/14 Permit)

Condition 20: Except for daily VEOs and VEEs as required by the CAM Plan, the permit does not require additional visible emission evaluation (VEE). However, the DEQ and EPA have authority to require a VEE, if necessary to determine compliance with an emission limit or standard.
(Condition 19 of 5/28/14 Permit)

Condition 21: If testing is conducted, the permittee shall use appropriate methods and procedures approved by DEQ.

Reporting

Condition 22: As part of the CAM plan, the permittee shall submit CAM reports semi-annually with other reports required by the general conditions. These reports shall include a summary of information on excursions, a summary of information monitor downtime incidents, and a description of actions taken to implement a QIP, if necessary.

Streamlined Requirements

Condition 3 of the Title V permit is a restatement of Condition 3 in the 5/28/14 Permit on fugitive emissions, which is the same as Condition 9 in the 5/28/14 Permit. The repeated condition is streamlined out of the Title V permit.

EMISSION UNIT APPLICABLE REQUIREMENTS - Finishing Operations (F1)

Limitations

The volatile organic compound (VOC) emissions from the finishing operation are the most significant criteria pollutant emissions from the facility. To remain below the PSD threshold, the source requested a VOC facility emission limit of 247 tons per year. A BACT analysis was conducted (as part of the Permit Application dated April 1998) and, for the finishing operations, was determined to be the use of high volume, low pressure (HVLP) guns when spraying, compliance with the Wood Furniture NESHAP, and fiberglass filters, or equivalent, in the spray booths. The following are BACT requirements included in the November 24, 1999 permit and carried forward into the NSR permit issued on March 7, 2005, as amended on May 28, 2014.

Condition 23: Requires particulate emissions from the spray booths to be controlled by fiberglass filters or equivalent.
(Condition 11 of 5/28/14 Permit)

Condition 24: Requires VOC emissions from the spray booths to be minimized by HVLP or equivalent spray guns.
(Condition 13 of 5/28/14 Permit)

Condition 25: Limits the VOC emissions from the facility in lbs/hour and tons/year.
(Condition 14 of 5/28/14 Permit)

Condition 26: Sets a visible emission limit for each spray booth and curing oven.
(Condition 15 of 5/28/14 Permit)

Condition 27: Requires the development of a maintenance schedule, and inventory of spare parts for air pollution control equipment, written operating procedures for air pollution control equipment, and for operators to be trained in the proper operation of that equipment.
(Condition 36 of 5/28/14 Permit)

Monitoring

The requirements of the regulations for federal operating permits, 9 VAC 5-80-110, state that the permit should include conditions for periodic monitoring sufficient to demonstrate that the facility is in compliance with the limits of the permit. An initial visible emissions evaluation (VEE) was conducted on 11 spray booths and 4 curing ovens in 2006. All units demonstrated compliance with the visible emission limit. Periodic observations on the exhaust stack of the spray booths and the natural gas fired curing ovens are sufficient to determine ongoing compliance with the visible emission limit.

Title V Condition

Condition 28: Requires a visible emissions observation (VEO) on the exhaust stack of the spray booths and curing ovens, on a weekly basis, when operating; and, requires corrective action if visible emissions are present.

Condition 29: Requires an observation log of the VEOs.

Compliance Assurance Monitoring (CAM) Applicability

Although the facility is a Title V major source for VOC emissions exceeding 100 tons per year, CAM does not apply to the Finishing Operations (F1) since there are no add-on control devices. Instead, the permittee conducts periodic monitoring based on visible emission observations, as

stated in Conditions 28 and 29, to indicate compliance with the opacity standard in Condition 36. Without a VOC control device, the volatile content of the used finishing materials are assumed to be all released as VOC emissions from the Finishing Operations (F1).

Recordkeeping

The permit includes requirements for recordkeeping necessary to demonstrate compliance with the facility-wide VOC emission limit. Because of the facility-wide VOC limit, recordkeeping requirements are included in the Title V permit to ensure the limits are not exceeded.

Condition 30: Requires recordkeeping of annual consumption of VOC containing material, MSDS information, and VOC emissions calculations. (Condition 17 of 5/28/14 Permit)

The condition has been appended to include additional recordkeeping for the Title V permit.

Condition 30 d.: Requires recordkeeping of annual natural gas consumption at the facility. The condition was added in the initial Title V permit and being kept in the renewal permit also for emissions inventory purposes.

Condition 30 e.: Requires visible emission observations (VEO) logs be kept.

Testing

The minor new source review permit issued on March 7, 2005, as amended May 28, 2014, allows for the installation of up to 14 spray booths and curing ovens totaling 5 MMBtu/hr in capacity. However, only eleven spray booths and four curing ovens have been installed so far, and have demonstrated compliance with the visible emission limit.

Condition 31: The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. (Conditions 12 and 18 of 5/28/14 Permit)

Condition 32: If testing is conducted, the permittee shall use appropriate methods and procedures approved by DEQ.

Reporting

The reporting requirements for the Finishing Operations (F1) are included in the next section of the Title V permit on Facility Wide Conditions for Hazardous Air Pollutant Emissions.

Streamlined Requirements

The previous condition for visible emission evaluations have been removed from the 5/28/14 Permit and the Title V permit since completed for all 11 spray booths. Installation of more spray booths may be subject to further permitting and additional VEE or testing requirements, and would be considered also a change from their current Title V permit.

EMISSION UNIT APPLICABLE REQUIREMENTS: Facility-Wide Conditions for Hazardous Air Pollutant Emissions

Limitations

The permittee is subject to the 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Wood Furniture MACT). All applicable limitations from the Wood Furniture MACT have been included in the permit including changes from the November 21, 2011 amendment to Subpart JJ. The amendment added limits on formaldehyde emissions that the facility has to comply with by November 21, 2014. Also, the amendment to Subpart JJ changed what type of air spray guns can be used under the work practice standards. Conventional air spray guns cannot be used after November 21, 2014, unless where emissions are routed to a functioning VOC control device.

Being subject to the Wood Furniture MACT means that the permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Any applicable limitations from the general provisions have also been included in the permit.

Condition 33: Except where the permit is more restrictive, the permittee is subject to 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Wood Furniture MACT).
(Condition 21 of 5/28/14 Permit)

Condition 34: Lists Volatile Hazardous Air Pollutant (VHAP) emission limits to comply with Wood Furniture MACT, 40 CFR 63.802(b) based on average VHAP content of materials used or using compliant coatings not exceeding 0.8 lbs VHAP/lb solids. The condition has been revised to incorporate additional detail in the MACT on aerosol adhesives and limits on formaldehyde use and emissions.
(Condition 22 of 5/28/14 Permit)

Condition 35: Requires permittee to follow proper operation and maintenance procedures.
(Condition 26 of 5/28/14 Permit)

Condition 36: Lists the work practice standards from Wood Furniture MACT with revision of November 21, 2011, such as restriction on not using conventional air spray guns. (Condition 27 of 5/28/14 Permit)

Monitoring

The Wood Furniture MACT contains adequate monitoring to meet Title V periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit.

Condition 37: Lists the revised Wood Furniture MACT requirements for continuous compliance, including daily and/or monthly recordkeeping depending on method used to demonstrate compliance (using compliant coatings or calculating average VHAP content of finishing materials applied). The updated condition includes a new section with two ways to comply with the formaldehyde emission requirements by November 21, 2014. There is also a new continuing compliance option that uses the viscosity of the coating to demonstrate compliance.
(part of Condition 24 of 5/28/14 Permit)

Testing

Condition 38: The permit does not require source testing. The DEQ and EPA have the authority to require testing not included in the permit if necessary to determine compliance with an emission limit or standard. Test methods have been identified in the permit from 40 CFR 63.805, if testing is required later.

Recordkeeping

Condition 39: The Wood Furniture MACT contains requirements for recordkeeping, including maintaining certified product data sheets, monthly consumption records and averaging records used to demonstrate continuing compliance, information on the work practice implementation plan, and compliance certifications. The Wood Furniture MACT contains adequate recordkeeping to meet Title V recordkeeping requirements. No additional recordkeeping has been included in the Title V permit. Record retention is different from the MACT in that all 5 years of data needs to be kept on site to more closely match DEQ requirements.
(Condition 28 of 5/28/14 Permit)

Reporting

The Wood Furniture MACT requires that a source report their compliance status annually, as well as demonstrating continuous compliance semi-annually to both the Department and the EPA. These requirements have been included in the permit and will be submitted concurrently with the reporting requirements contained in the General Conditions of the permit.

Condition 40: Lists addresses for DEQ and EPA to submit reports and correspondence. (Condition 20 of 5/28/14 Permit)

Condition 41: Requires permittee to submit a certified notification of compliance status to DEQ attesting compliance with 40 CFR 63, subpart JJ. (Condition 23 of 5/28/14 Permit)

Condition 42: The Wood Furniture MACT requires that a source demonstrate continuous compliance and submit monitoring results semi-annually. (Condition 25 of 5/28/14 Permit)

Streamlined Conditions

The permittee has opted not to use a control device to meet the Wood Furniture MACT. Therefore, the MACT requirements regarding use of control device have not been included in the permit.

The initial notifications required by the Wood Furniture MACT for start-up operations and initial compliance status reports have not been included in the permit because the source has fulfilled the requirement.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units, listed in Condition 43, are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC _)	Pollutant(s) Emitted (9 VAC 5-80-720B)	Rated Capacity (9 VAC 5-80-720C)
B1, B2	Two TRIAD model GPS 600-SH, gas-fired boilers	5-80-720.C. 2.a	-	0.6 million Btu/hr, each
H1, H2, H3, H4	Four Trane gas-fired space heaters	5-80-720.C. 2.a	-	0.25 million Btu/hr, each
H5, H6	Two King gas-fired space heaters	5-80-720.C. 2.a	-	3.38 million Btu/hr, each
M1	Greenheck gas-fired make-up air/space heater	5-80-720.C. 2.a	-	0.79 million Btu/hr
M2, M3	Two Greenheck gas-fired make-up air/ space heaters	5-80-720.C. 2.a	-	0.70 million Btu/hr, each
M4	AbsoluteAire, Inc. make-up air/space heater	5-80-720.C. 2.a	-	0.65 million Btu/hr
M5, M6, M7, M8	Four Rupp Air make-up air units	5-80-720.C. 2.a	-	4.54 million Btu/hr, each
PW1	Parts washer, Justrite model 27220 rinse tank	5-80-720.B.2	VOC	-
PW2	Parts washer, Safety Kleen model 11 immersion cleaner	5-80-720.B.2	VOC	-

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

PERMIT SHIELD & INAPPLICABLE REQUIREMENTS

Condition 44 of the Title V permit lists three inapplicable federal requirements. The facility no longer operates an 800 kW emergency/peak shaving diesel generator, which would have been subject 40 CFR 63 (MACT) subpart ZZZZ (for Stationary Reciprocating Internal Combustion Engines). The facility has two small boilers and 14 small gas-fired space heaters and make-up air units with a combined capacity of nearly 30 million Btu/hr. However, they are too small and do not generate steam to be subject to 40 CFR 60 (NSPS), Subpart Dc (for Small Industrial-Commercial-Institutional Steam Generating Units). Initially, the two small gas-fired boilers, each rated at 0.6 million Btu/hr, were considered subject to 40 CFR 63, Subpart DDDDD (Boiler MACT). However, it was later determined that they are not steam generating boilers but rather hot water boilers that are exempted under the definition of "hot water heater" in 40 CFR 60.7575. Therefore, they are listed as "Insignificant Emission Units" based on boiler size and low emissions like the other space heater and make-up air units.

The woodworking operations would be subject to the state regulations for existing sources given in 9 VAC Chapter 40, Article 17. However, the facility was issued a permit with more stringent requirements than provided in the rule, including particulate matter and visible emission limits. Therefore, the requirements of the rule are not included in the Title V permit. Also, the two cold solvent cleaners at the facility are not subject to the state regulations given in 9 VAC Chapter 40, Article 24, Emission Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents (Rule 4-24), since the rule does not apply to units located outside VOC emission control areas, such as Culpeper County.

The provisions of 40 CFR Part 98 - Mandatory Greenhouse Gas Reporting require owners and operators of general stationary fuel combustion sources that emit 25,000 metric tons CO2e or more per year in combined emissions from such units, to report greenhouse gas (GHG) emissions, annually. The definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include requirements such as those included in Part 98, promulgated under Clean Air Act (CAA) section 114(a)(1) and 208. Therefore, the requirements of 40 CFR Part 98 are not applicable under the Title V permitting program.

As a result of several EPA actions regarding GHG under the CAA, emissions of GHG must be addressed for a Title V permit renewed after January 1, 2011. However, the facility is not a PSD major source but minor GHG source with no GHG-specific applicable requirements in its permit. Therefore, the Title V permit has no applicable conditions for the facility specific to GHG.

GENERAL CONDITIONS

The permit contains general conditions (45 to 85) required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration (Conditions 46 to 51)

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

These general conditions cite the Article that follows:
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

These general conditions cite the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

Deviation, Failure, Malfunction Reporting (Conditions 56 to 57)

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

These general Conditions cite the sections that follow:

9 VAC 5-40-50. Notification, Records and Reporting
9 VAC 5-50-50. Notification, Records and Reporting

Permit Modification (Condition 61)

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Malfunction as an Affirmative Defense (Conditions 75 to 78)

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in Condition 75 to 78 and Conditions 56 to 57. For further explanation see the comments on Conditions 56 to 57.

These general conditions cite the sections that follow:
9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Asbestos Requirements (Condition 82)

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

STATE ONLY APPLICABLE REQUIREMENTS

There are no "State Only" applicable requirements identified for the source.

FUTURE APPLICABLE REQUIREMENTS

The facility did not identify any future applicable requirements. They had listed their two small boilers (B1, B2) as subject to 40 CFR 63, Subpart DDDDD (Boiler MACT) by January 31, 2016. However, they later determined that the gas-fired hot water boilers are exempt from the MACT.

COMPLIANCE PLAN

The facility is not subject to a Compliance Plan.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in the Culpeper Star Exponent newspaper on December 5, 2014, for comments to be received from December 5, 2014, to January 6, 2015. Maryland, the only affected state, and the city of Washington, D.C. were sent a copy of the public notice in an email dated December 5, 2014. All persons on the Title V mailing list were also sent a copy of the public notice via either letter or email dated December 5, 2014. No public comments were received by the end of the comment period on January 6, 2015.

EPA was notified of the public notice and sent a copy of the Statement of Basis and draft permit on December 4, 2014. The concurrent 45-day EPA review period ended on January 21, 2015, without comment.

ATTACHMENTS

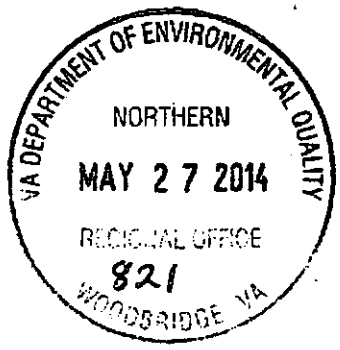
ATTACHMENT A:	213 Annual Emissions Update
ATTACHMENT B:	Minor New Source Review Permit with amendment dated May 28, 2014
ATTACHMENT C:	CAM Plan for the fabric filter baghouse (BH1)

Attachment A

MASCO
CABINETRY

Masco Cabinetry LLC, 641 Maddox Drive, Culpeper, Va. 22701

T. Page



Certified Mail

May 23, 2014

Air Compliance Manager
Virginia Department of Environmental
Quality/Northern Regional Office
13901 Crown Court
Woodbridge, VA. 22193

CBDS
5-28-14
JWP

Re: Permit Number 40728

Dear Sir:

This letter is being submitted by the Masco Cabinetry LLC, Culpeper Virginia Facility, per our conversation May 23, 2014 I have revised the total Haps on the Emission Statement for Calendar Year 2013. The plant is located at 641 Maddox Drive, Culpeper,Va. 22701. Any questions feel free to contact me at 540-727-7845.

Sincerely,

Bonnie Wharton

Bonnie Wharton

Enclosure: 2013 Emission Statement
Finishing Emissions Summary
Emission Statement Certification
Document Certification

DEQ

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

2013 EMISSION STATEMENT

Please correct any errors in the information below (cross out & replace)

FACILITY NAME MASCO CABINETRY LIMITED LIABILITY - CULPEPER	***REGISTRATION #*** 40728	***CONTACT PERSON*** BONNIE WHARTON	
LOCATION ADDRESS 641 Maddox Dr Culpeper VA		***JURISDICTION*** Culpeper County	
MAILING ADDRESS 641 Maddox Dr	***MAILING CITY AND STATE*** Culpeper VA	***ZIPCODE*** 22701	
OWNER NAME Masco Cabinetry LLC	***TELEPHONE NUMBER*** 5407277845	***PRIMARY NAICS CODE*** 337110	*For Agency Use Only* *Title V Major*

FACILITY TOTALS *(Sum emissions from attached pages)*

	ANNUAL		OZONE SEASON	
TOTAL VOC EMISSIONS FOR 2013	162.45	TONS/YR	1270.22	LBS/DAY
TOTAL NO_x EMISSIONS FOR 2013	9.2631	TONS/YR	131.07	LBS/DAY
TOTAL SO_2 EMISSIONS FOR 2013	.5507	TONS/YR	NA	
TOTAL PM_{10} EMISSIONS FOR 2013	2.235	TONS/YR	NA	
TOTAL PB EMISSIONS FOR 2013	N/A	TONS/YR	NA	
TOTAL TRS EMISSIONS FOR 2013	N/A	TONS/YR	NA	
TOTAL TNMOC EMISSIONS FOR 2013 (landfills only)	N/A	TONS/YR	NA	
TOTAL non-VOC/non-PM HAP EMISSIONS FOR 2013	25.49	TONS/YR	NA	
TOTAL CO EMISSIONS FOR 2013	7.7242	TONS/YR	NA	
TOTAL $PM_{2.5}$ EMISSIONS FOR 2013	2.2357	TONS/YR	NA	
TOTAL NH3 EMISSIONS FOR 2013	N/A	TONS/YR	NA	

PLEASE ATTACH "ANNUAL UPDATE" FORM.
PLEASE ATTACH "EMISSION STATEMENT CERTIFICATION" with appropriate signature.

2013 EMISSION CALCULATION
OPTION I: EMISSION FACTOR METHOD

Diesel Fuel

REGISTRATION #: 40728 STACK NO.: _____ POINT NO.: _____ SEGMENT NO.: _____ SCC NO.:

	ANNUAL	PEAK OZONE SEASON (JUNE, JULY, AUGUST)
THRUPUT (with units)	147.6 gals	
NO. OPERATING DAYS	255 days	days
NO. OPERATING HOURS PER DAY	16 hours	hours
DAILY THRUPUT (with units) = Thruput) days	NA	per day
VOC EMISSION FACTOR (with units) = EF	0.56 lb/hr	
Emission Factor source[1] / Control Efficiency basis[2]	AP42 / D	
VOC CONTROL DEVICE CODE[3]		
Avg. VOC CONTROL EFFICIENCY[4] = CE	0 %	%
VOC EMISSIONS[5]	.0028 tons VOC per yr	lbs VOC per day
NOx EMISSION FACTOR (with units) = EF	17.1 lb/hr	
Emission Factor source[1] / Control Efficiency basis[2]	AP-42 / D	
NOx CONTROL DEVICE CODE[3]		
Avg. NOx CONTROL EFFICIENCY[4] = CE	0 %	%
NOx EMISSIONS[5]	0.09 tons NOx per yr	lbs NOx per day
SO2 EMISSION FACTOR (with units) = EF	3.58 lb/hr	
Emission Factor source[1] / Control Efficiency basis[2]	AP-42 / D	
FUEL PARAMETER (% ash or % sulfur) = FP	15 %	%
SO2 CONTROL DEVICE CODE[3]		
Avg. SO2 CONTROL EFFICIENCY[4] = CE	0 %	%
SO2 EMISSIONS[5]	.00002 tons SO2 per yr	lbs SO2 per day
PM10 EMISSION FACTOR (with units) = EF	0.49 lb/hr	
Emission Factor source[1] / Control Efficiency basis[2]	AP42 / D	
FUEL PARAMETER (% ash or % sulfur) = FP	15 90 %	%
PM10 CONTROL DEVICE CODE[3]		
Avg. PM10 CONTROL EFFICIENCY[4] = CE	0 %	%
PM10 EMISSIONS[5]	0.00012 tons PM10 per yr	lbs PM10 per day
PB EMISSION FACTOR (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]	/	
PB CONTROL DEVICE CODE[3]		
Avg. PB CONTROL EFFICIENCY[4] = CE	%	%
PB EMISSIONS[5]	N/A tons PB per yr	lbs PB per day

1. AP-42; CEMS; ST = Stack test; F = Federal factor (EPA standard factor); O = Other (describe on separate sheet; use subject to DEQ approval)
2. A = Tested (by EPA Reference Method); B = Tested (other); C = Material balance; D = Design; O = Other (describe on separate sheet)
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions = ANNUAL THRUPUT x EF x FP x (1/2000) x (100-CE)/100 ; Ozone Emissions = DAILY THRUPUT x EF x FP x (100-CE)/100

2013 EMISSION CALCULATIO[illegible]
OPTION I: EMISSION FACTOR METHO[illegible] (continued)

Diesel Fuel

REGISTRATION #: 40728 STACK NO.: _____ POINT NO.: _____ SEGMENT NO.: _____ SCC NO.:

	ANNUAL	PEAK OZONE SEASON (JUNE, JULY, AUGUST)
THRUPUT (with units)	147.6 gals	
NO. OPERATING DAYS	255 days	days
NO. OPERATING HOURS PER DAY	16 hours	hours
DAILY THRUPUT (with units) = Thruput) days	NA	per day
TRS Emission Factor (with units) = EF	NA	
Emission Factor source[1] / Control Efficiency basis[2]		
TRS CONTROL DEVICE CODE[3]		
Avg. TRS CONTROL EFFICIENCY[4] = CE	%	%
TRS EMISSIONS[5]	tons TRS per yr	lbs TRS per day
TNMOC EMISSION FACTOR (with units) = EF	NA	
Emission Factor source[1] / Control Efficiency basis[2]	N / A	
TNMOC CONTROL DEVICE CODE[3]		
Avg. TNMOC CONTROL EFFICIENCY[4] = CE	%	%
TNMOC EMISSIONS[5]	NA tons TNMOC per yr	lbs TNMOC per day
CO EMISSION FACTOR (with units) = EF	2.96 lb/hr	
Emission Factor source[1] / Control Efficiency basis[2]	AP-42 / D	
CO CONTROL DEVICE CODE[3]		
Avg. CO CONTROL EFFICIENCY[4] = CE	%	%
CO EMISSIONS[5]	.01 tons per yr	lbs per day
PM 2.5 EMISSION FACTOR (with units) = EF	0.49 lb/hr	
Emission Factor source[1] / Control Efficiency basis[2]	AP42 / D	
FUEL PARAMETER (% ash or % sulfur) = FP	< 5%	%
PM 2.5 CONTROL DEVICE CODE[3]		
Avg. PM 2.5 CONTROL EFFICIENCY[4] = CE	0 %	%
PM 2.5 EMISSIONS[5]	.00012 tons per yr	lbs per day
NH3 EMISSION FACTOR (with units) = EF	NA	
Emission Factor source[1] / Control Efficiency basis[2]		
NH3 CONTROL DEVICE CODE[3]		
Avg. NH3 CONTROL EFFICIENCY[4] = CE	%	%
NH3 EMISSIONS[5]	NA tons per yr	lbs per day

1. AP-42; CEMS; ST = Stack test; F = Federal factor (EPA standard factor); O = Other (describe on separate sheet; use subject to DEQ approval)
2. A = Tested (by EPA Reference Method); B = Tested (other); C = Material Balance; D = Design; O = Other (describe on separate sheet)
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions = ANNUAL THRUPUT x EF x FP x (1/2000) x (100-CE)/100 ; Ozone Emissions = DAILY THRUPUT x EF x FP x (100-CE)/100

2013 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD (HAPs)

Diesel Fuel

REGISTRATION #: 40728 STACK NO.: POINT NO.: SEGMENT NO.: SCC NO.:

	ANNUAL	PEAK OZONE SEASON (JUNE, JULY, AUGUST)
THRUPUT (with units)	147.6 gals	
NO. OPERATING DAYS	255 days	days
NO. OPERATING HOURS PER DAY	16 hours	hours
DAILY THRUPUT (with units) = Thruput) days	NA	per day
HAP EMISSION FACTOR (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]		
HAP CONTROL DEVICE CODE[3]		
Avg. HAP CONTROL EFFICIENCY[4] = CE	%	%
HAP (____) EMISSIONS[5]	N/A tons TNMOC per yr	lbs TNMOC per day
HAP EMISSION FACTOR (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]		
HAP CONTROL DEVICE CODE[3]		
Avg. HAP CONTROL EFFICIENCY[4] = CE	%	%
HAP (____) EMISSIONS[5]	N/A tons per yr	lbs per day
HAP EMISSION FACTOR (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]		
HAP CONTROL DEVICE CODE[3]		
Avg. HAP CONTROL EFFICIENCY[4] = CE	%	%
HAP (____) EMISSIONS[5]	N/A tons per yr	lbs per day
HAP EMISSION FACTOR (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]		
HAP CONTROL DEVICE CODE[3]		
Avg. HAP CONTROL EFFICIENCY[4] = CE	%	%
HAP (____) EMISSIONS[5]	N/A tons per yr	lbs per day
HAP EMISSION FACTOR (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]		
HAP CONTROL DEVICE CODE[3]		
Avg. HAP CONTROL EFFICIENCY[4] = CE	%	%
HAP (____) EMISSIONS[5]	N/A tons per yr	lbs per day
HAP Emission Factor (with units) = EF	N/A	
Emission Factor source[1] / Control Efficiency basis[2]		
HAP CONTROL DEVICE CODE[3]		
Avg. HAP CONTROL EFFICIENCY[4] = CE	%	%
HAP (____) EMISSIONS[5]	N/A tons per yr	lbs per day

1. AP-42; CEMS; ST = Stack test; F = Federal factor (EPA standard factor); O = Other (describe on separate sheet; use subject to DEQ approval)
2. A = Tested (by EPA Reference Method); B = Tested (other); C = Material Balance; D = Design; O = Other (describe on separate sheet)
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions = ANNUAL THRUPUT x EF x FP x (1/2000) x (100-CE)/100 ; Ozone Emissions = DAILY THRUPUT x EF x FP x (100-CE)/100

2013 EMISSION CALCULATIO
OPTION I: EMISSION FACTOR METHOD (continued)

Natural Gas

REGISTRATION #: 40729 STACK NO.: _____ POINT NO.: _____ SEGMENT NO.: GAS SCC NO.:

	ANNUAL	PEAK OZONE SEASON (JUNE, JULY, AUGUST)
THRUPUT (with units)	184 MM SCF	
NO. OPERATING DAYS	255 days	days
NO. OPERATING HOURS PER DAY	16 hours	hours
DAILY THRUPUT (with units) = Thruput) days	NA	per day
TRS Emission Factor (with units) = EF	N A	
Emission Factor source[1] / Control Efficiency basis[2]		
TRS CONTROL DEVICE CODE[3]		
Avg. TRS CONTROL EFFICIENCY[4] = CE	%	%
TRS EMISSIONS[5]	N A tons TRS per yr	lbs TRS per day
TNMOC EMISSION FACTOR (with units) = EF	N A	
Emission Factor source[1] / Control Efficiency basis[2]		
TNMOC CONTROL DEVICE CODE[3]		
Avg. TNMOC CONTROL EFFICIENCY[4] = CE	%	%
TNMOC EMISSIONS[5]	N A tons TNMOC per yr	lbs TNMOC per day
CO EMISSION FACTOR (with units) = EF	84.00 lb 10^6 SCF	
Emission Factor source[1] / Control Efficiency basis[2]	AP.42 D	
CO CONTROL DEVICE CODE[3]		
Avg. CO CONTROL EFFICIENCY[4] = CE	0 %	%
CO EMISSIONS[5]	7.7094 tons per yr	lbs per day
PM 2.5 EMISSION FACTOR (with units) = EF	7.60 lb MMSCF	
Emission Factor source[1] / Control Efficiency basis[2]	AP-42 D	
FUEL PARAMETER (% ash or % sulfur) = FP	%	%
PM 2.5 CONTROL DEVICE CODE[3]		
Avg. PM 2.5 CONTROL EFFICIENCY[4] = CE	0 %	%
PM 2.5 EMISSIONS[5]	0.6975 tons per yr	lbs per day
NH3 EMISSION FACTOR (with units) = EF	N A	
Emission Factor source[1] / Control Efficiency basis[2]		
NH3 CONTROL DEVICE CODE[3]		
Avg. NH3 CONTROL EFFICIENCY[4] = CE	%	%
NH3 EMISSIONS[5]	N A tons per yr	lbs per day

1. AP-42; CEMS; ST = Stack test; F = Federal factor (EPA standard factor); O = Other (describe on separate sheet; use subject to DEQ approval)
2. A = Tested (by EPA Reference Method); B = Tested (other); C = Material Balance; D = Design; O = Other (describe on separate sheet)
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions = ANNUAL THRUPUT x EF x FP x (1/2000) x (100-CE)/100 ; Ozone Emissions = DAILY THRUPUT x EF x FP x (100-CE)/100

2013 EMISSION CALCULATION
OPTION I: EMISSION FACTOR METHOD

Natural Gas

REGISTRATION #: 40128 STACK NO.: _____ POINT NO.: _____ SEGMENT NO.: 1 SCC NO.:

	ANNUAL	PEAK OZONE SEASON (JUNE, JULY, AUGUST)
THRUPUT (with units)	184 mm SCF	
NO. OPERATING DAYS	255 days	days
NO. OPERATING HOURS PER DAY	16 hours	hours
DAILY THRUPUT (with units) = Thruput) days	NA	per day
VOC EMISSION FACTOR (with units) = EF	5.50 lb 10^6 SCF	
Emission Factor source[1] / Control Efficiency basis[2]	AP-42 D	
VOC CONTROL DEVICE CODE[3]		
Avg. VOC CONTROL EFFICIENCY[4] = CE	0 %	%
VOC EMISSIONS[5]	.5048 tons VOC per yr	lbs VOC per day
NOx EMISSION FACTOR (with units) = EF	100.00 lb 10^6 SCF	
Emission Factor source[1] / Control Efficiency basis[2]	AP-42 D	
NOx CONTROL DEVICE CODE[3]		
Avg. NOx CONTROL EFFICIENCY[4] = CE	0 %	%
NOx EMISSIONS[5]	9.1779 tons NOx per yr	lbs NOx per day
SO2 EMISSION FACTOR (with units) = EF	0.60 lb 10^6 SCF	
Emission Factor source[1] / Control Efficiency basis[2]	AP 42 D	
FUEL PARAMETER (% ash or % sulfur) = FP	%	%
SO2 CONTROL DEVICE CODE[3]		
Avg. SO2 CONTROL EFFICIENCY[4] = CE	%	%
SO2 EMISSIONS[5]	0.5507 tons SO2 per yr	lbs SO2 per day
PM10 EMISSION FACTOR (with units) = EF	7.60 lb 10^6 SCF	
Emission Factor source[1] / Control Efficiency basis[2]	AP 42 D	
FUEL PARAMETER (% ash or % sulfur) = FP	%	%
PM10 CONTROL DEVICE CODE[3]		
Avg. PM10 CONTROL EFFICIENCY[4] = CE	0 %	%
PM10 EMISSIONS[5]	0.6975 tons PM10 per yr	lbs PM10 per day
PB EMISSION FACTOR (with units) = EF	NA	
Emission Factor source[1] / Control Efficiency basis[2]		
PB CONTROL DEVICE CODE[3]		
Avg. PB CONTROL EFFICIENCY[4] = CE	%	%
PB EMISSIONS[5]	NA tons PB per yr	lbs PB per day

1. AP-42; CEMS; ST = Stack test; F = Federal factor (EPA standard factor); O = Other (describe on separate sheet; use subject to DEQ approval)
2. A = Tested (by EPA Reference Method); B = Tested (other); C = Material balance; D = Design; O = Other (describe on separate sheet)
3. See 3-digit control device codes listed in appendix.
4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions = ANNUAL THRUPUT x EF x FP x (1/2000) x (100-CE)/100 ; Ozone Emissions = DAILY THRUPUT x EF x FP x (100-CE)/100

2013 EMISSION CALCULATIONS
OPTION I: EMISSION FACTOR METHOD (HAPs)

Natural GAS

REGISTRATION #: 40728 STACK NO.: ______ POINT NO.: ______ SEGMENT NO.: ______ SCC NO.:

	ANNUAL		PEAK OZONE SEASON (JUNE, JULY, AUGUST)	
THRUPUT (with units)	184 MMSCF			
NO. OPERATING DAYS	255 days		days	
NO. OPERATING HOURS PER DAY	16 hours		hours	
DAILY THRUPUT (with units) = Thruput / days	NA		per day	
HAP EMISSION FACTOR (with units) = EF	N/A			
Emission Factor source[1] / Control Efficiency basis[2]				
HAP CONTROL DEVICE CODE[3]				
Avg. HAP CONTROL EFFICIENCY[4] = CE	%		%	
HAP (______) EMISSIONS[5]	N/A tons TNMOC per yr		lbs TNMOC per day	
HAP EMISSION FACTOR (with units) = EF	N/A			
Emission Factor source[1] / Control Efficiency basis[2]				
HAP CONTROL DEVICE CODE[3]				
Avg. HAP CONTROL EFFICIENCY[4] = CE	%		%	
HAP (______) EMISSIONS[5]	N/A tons per yr		lbs per day	
HAP EMISSION FACTOR (with units) = EF	N/A			
Emission Factor source[1] / Control Efficiency basis[2]				
HAP CONTROL DEVICE CODE[3]				
Avg. HAP CONTROL EFFICIENCY[4] = CE	%		%	
HAP (______) EMISSIONS[5]	N/A tons per yr		lbs per day	
HAP EMISSION FACTOR (with units) = EF	N/A			
Emission Factor source[1] / Control Efficiency basis[2]				
HAP CONTROL DEVICE CODE[3]				
Avg. HAP CONTROL EFFICIENCY[4] = CE	%		%	
HAP (______) EMISSIONS[5]	N/A tons per yr		lbs per day	
HAP EMISSION FACTOR (with units) = EF	N/A			
Emission Factor source[1] / Control Efficiency basis[2]				
HAP CONTROL DEVICE CODE[3]				
Avg. HAP CONTROL EFFICIENCY[4] = CE	%		%	
HAP (______) EMISSIONS[5]	N/A tons per yr		lbs per day	
HAP Emission Factor (with units) = EF	N/A			
Emission Factor source[1] / Control Efficiency basis[2]				
HAP CONTROL DEVICE CODE[3]				
Avg. HAP CONTROL EFFICIENCY[4] = CE	%		%	
HAP (______) EMISSIONS[5]	N/A tons per yr		lbs per day	

1. AP-42; CEMS; ST = Stack test; F = Federal factor (EPA standard factor); O = Other (describe on separate sheet; use subject to DEQ approval)
2. A = Tested (by EPA Reference Method); B = Tested (other); C = Material Balance; D = Design; O = Other (describe on separate sheet)
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4. Note control efficiency will be zero if there is no control device OR the emission factor accounts for controls (i.e. EF is identified to be "with controls").
5. Annual Emissions = ANNUAL THRUPUT x EF x FP x (1/2000) x (100-CE)/100 ; Ozone Emissions = DAILY THRUPUT x EF x FP x (100-CE)/100

Commonwealth of Virginia
Department of Environmental Quality

Annual Update for Calendar Year: 2013

Registration#: 40728
Plant Name: MASCO Cabinetry LLC - Culpeper
Physical Location: 641 Maddox Dr
Mailing Address: 641 Maddox Dr
Culpeper, VA 22701

Region: NVRO
County: 047 Culpeper County
Plant ID: 00032
Contact Person: Wharton, Bonnie
Telephone: (540)727-7845
Employees: 280
Principal Product: cabinets
SIC: 2434 NAICS: 337110
Inspector: Carney, Jonathan
Classification Major/Potential Major

Summary Data for Calendar Year: 2012

Stk	Pt	Seg	Segment Description	SCC	Annual Thruput	Units	% Sulfur	% Ash	Heat Content (mmbtu/ SCC unit)	% Overall Effic	Primary Control Equip	Secondary Control Equip	% Annual Thruput: Dec Feb	Mar May	Jun Aug	Sep Nov	Operating Schedule: Hr Dy	Dy Wk	Hr Yr	% Space Heat	Stack Parameters: Ht (ft)	Dia (ft)	Exit Temp (f)	Exit Flow Rate (ACFM)	Plume Ht (ft)	Elevation (ft)
1	1	1	Caterpillar G3412 diesel generator	20200401	81 / 0.1476	1000 Gallons Burned	.5	0	140				17	37	29	17	16	5	4200	99.9	3	1.29	475	1600		460
1	1	2	Cat G3412 Operation	38899992	2191 / 9.97	HOURS OPERATED							17	37	29	17	16	5	4200	99.9	3	1.29	475	1600		460
2	2	1	Coatings (total gallon usage)	40200110	38128 / 64,123	Gallons of Coating				99.3	101	099	17	37	29	17	16	5	4200						50	
											101 = High Efficiency Particulate Air Filter								099 = Miscellaneous Control Devices							
3	3	1	Cabinets Produced	30703097	375889 / 388,878	Each				99	018		17	37	29	17	16	5	4200						50	
											018 = Fabric Filter - Low Temperature i.e. T<180F															
4	4	1	Curing Ovens/MakeUp Air Units/Heaters	10300602	126 / 184	Million Cubic Feet Burned							25	25	25	25	16	5	50						50	

Cust # 28207

Merillat Generator Log

No longer used for load control

	ENTER	ENTER	ENTER	ENTER			Run Time Between Refueling	MTD Hours	YTD Hours	Rolling 12 Month	KWHR Used	MTD HWHR	ENTER # Gallons Added	MTD Gal.	ENTER Description
Year	Date	Day	Start	Stop	Run Time	Decimal Hours									
2012	12/31	Mon	5:52	7:54	2:02	2.03	9.7	101.6	219.1	402.0	149.5	1,556.7		14.3	Load Control
2013	01/02	Wed	13:48	14:15	0:27	10:46	0.5	0.5	0.5	112.7	80.3				Test Run
	01/04	Fri	4:56	8:15	3:19	7:36	3.3	3.8	3.8	116.0	996.0				Load Control
	01/04	Fri			---	---	---	---	---	---			147.6		Refuel
	01/08	Tues	5:52	7:14	1:22	8:48	1.4	5.1	5.1	117.4	363.1				Load Control
	01/08	Tues	13:30	14:14	0:44	17:36	0.7	5.9	5.9	116.1	148.9				Test Run
	01/15	Tues	13:30	14:14	0:44	17:36	0.7	6.6	6.6	116.8	148.7				Test Run
	01/22	Tues	13:31	14:15	0:44	17:36	0.7	7.3	7.3	119.6	154.3				Test Run
	01/23	Wed	4:53	7:31	2:38	15:12	2.8	10.0	10.0	122.2	779.8				Load Control
	01/31	Thur			---	---	---	---	---	---	---	2,651.1	327.7	475	Refuel
					---	---	---	---	---	---					
		Generator out of service			---	---	---	---	---	---					
		for the month of February			---	---	---	---	---	---					
		No run time or fuel delivery			---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
		Generator out of service			---	---	---	---	---	---					
		for the month of March			---	---	---	---	---	---					
		No run time or fuel delivery			---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					
		As of April 30			---	---	---	---	---	---					
		Merillat is no			---	---	---	---	---	---					
		longer participating			---	---	---	---	---	---					
		in REC's load			---	---	---	---	---	---					
		control program			---	---	---	---	---	---					
		No reports will			---	---	---	---	---	---					
		be done past			---	---	---	---	---	---					
		05/01/13			---	---	---	---	---	---					
					---	---	---	---	---	---					
					---	---	---	---	---	---					

Masco Cabinetry LLC (Culpeper Plant)
DB-0838-F
CALENDAR YEAR 2013 EMISSIONS INVENTORY
COMBUSTION EMISSIONS CALCULATIONS

AP-42 Emission Factors for small gas-fired domestic and commercial boilers:
(>0.3 and <10MMBtu/hr heat input)

VOC	5.50 lb/10^6 scf
NO_x	100.00 lb/10^6 scf
CO	84.00 lb/10^6 scf
PM	7.60 lb/10^6 scf
SO_2	0.60 lb/10^6 scf

Natural gas heating value: 1020 BTU/scf
2012 natural gas usage: 184 MMscf Mcf/1000

FIN	Max Firing Rate (MMBtu/hr)	Annual Firing Rate (MMBtu/yr)	Max Gas Usage (MMscf/yr)	Gas Usage (MMscf/yr)	Oper Sched (wks/yr)	Oper Sched (d/wk)	Oper Sched (hr/d)	Gas Usage (MMscf/d)	Percent of Max Potential
Ovens	5.28	21,542	46.35	87.44	51	5	16	0.343	192.83%
Heaters	14.8	23,680	127.11	96.12	20	5	16	0.961	75.62%
	0	0	0.00	0.00	0	0	0	0.000	#DIV/0!
	0	0	0.00	0.00	0	0	0	0.000	#DIV/0!
	0	0	0.00	0.00	0	0	0	0.000	#DIV/0!
		45,222	Total	183.56					

FIN	VOC (T/yr)	VOC (lb/d)	NO_x (T/yr)	NO_x (lb/d)	CO (T/yr)	CO (lb/d)	PM (T/yr)	PM (lb/d)	SO_2 (T/yr)	SO_2 (lb/hr)
Ovens	0.2405	0.0035	4.3720	34.2905	3.8725	28.8040	0.3323	2.6061	0.2623	0.0120
Heaters	0.2643	0.0097	4.8059	98.1173	4.0369	80.7388	0.3682	7.3048	0.2884	0.0138
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
TOTALS	0.5048	0.0132	9.1779	130.4077	7.7094	109.5428	0.6975	9.9110	0.5507	0.0264
Woodworking							1	0.00		
Diesel Generator	0.0027916	0.02	0.0852435	0.67	0.0147556	2.96	0.00	0.00	0.00	3.56
Finishing Totals	161.948385	1270.18					0.53802	1.96		
Facility Totals	162.4560	1270.22	9.2631	131.0783	7.7242	112.5028	2.2357	11.8721	0.5507	3.5964

	Max Rated Burned/Hour	Max. % Sulfur	PM T/yr	PM lb/day	PM lb/hr	SO2 T/yr	SO2 lb/hr	NOx T/yr	Nox lbs/day	Nox lb/hr	CO T/yr	CO lb/hr	VOC T/yr	VOC lbs/day	VOC lb/hr	Total hrs run
Diesel Generator	7.17	0.5	0.00	0.02	0.49	0.02	3.56	0.09	0.67	17.1	3.7	2.96	0.0027916	0.021391571	0.56	9.97
			0.00012	0.00		0.00					0.00148					Total Gals
Diesel Generator	7.17	0.5	0.00012	0.001	0.49	0.00002	3.56	0.09	0.67	17.1	0.01	2.96	0.0028		0.56	147.6

Commonwealth of Virginia
Department of Environmental Quality

Annual Update for Calendar Year: 2013

Registration#: 40728
Plant Name: MASCO Cabinetry LLC - Culpeper
Physical Location: 641 Maddox Dr
Mailing Address: 641 Maddox Dr
Culpeper, VA 22701

Region: NVRO
County: 047 Culpeper County
Plant ID: 00032
Contact Person: Wharton, Bonnie
Telephone: (540)727-7845
Employees: 280
Principal Product: cabinets
SIC: 2434 NAICS: 337110
Inspector: Carney, Jonathan
Classification Major/Potential Major

Summary Data for Calendar Year: 2012

Stk	Pt	Seg	Segment Description	SCC	Annual Thruput	Units	% Sulfur	% Ash	Heat Content (mmbtu/ SCC unit)	% Overall Effic	Primary Control Equip	Secondary Control Equip	% Annual Thruput				Operating Schedule			% Space Heat	Stack Parameters					
													Dec Feb	Mar May	Jun Aug	Sep Nov	Hr Dy	Dy Wk	Hr Yr		Ht (ft)	Dia (ft)	Exit Temp (f)	Exit Flow Rate (ACFM)	Plume Ht (ft)	Elevation (ft)

Document Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Responsible Official (Print) NATHAN MARINEAU

Title DIRECTOR OF MANUFACTURING

Signature Nathan Marineau Date 4-9-14

DEQ

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

EMISSION STATEMENT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(see reverse side for instructions)

SIGNATURE: Nathan Martinez **DATE:** 4-9-14

PRINTED NAME: NATHAN MARTINEZ

TITLE: DIRECTOR OF MANUFACTURING

COMPANY: MASCO Cabinetry

REGISTRATION NUMBER: 40728

TELEPHONE NUMBER: 540-727-7848

THE FOLLOWING EMISSIONS SUMMARY PAGE OF CALENDAR YEAR 2013 HAS BEEN REVISED WITH AN EMISSIONS STATEMENT SUMMARY PAGE RECEIVED MAY 27, 2014. SUPPORTING DOCUMENTATION WAS ALSO RECEIVED ON THE SAME DATE. ALL ASSOCIATED DOCUMENTS, INCLUDING THE REVISED PAGES, ARE ATTACHED TO AN INSPECTION REPORT DATED MAY 28, 2014.

40728

MASCO
CABINETRY

Masco Cabinetry LLC, 641 Maddox Drive, Culpeper, Va. 22701

Certified Mail

April 8, 2014

VA DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN
APR 10 2014
REGIONAL OFFICE
627 TSE
WOODBRIDGE, VA

Air Compliance Manager
Virginia Department of Environmental
Quality/Northern Regional Office
13901 Crown Court
Woodbridge, VA. 22193

Re: Permit Number 40728

Dear Sir:

This letter is being submitted by the Masco Cabinetry LLC, Culpeper Virginia Facility, to fulfill the Emission Statement for Calendar Year 2013. The plant is located at 641 Maddox Drive, Culpeper,Va. 22701.

Sincerely,

Bonnie Wharton

Bonnie Wharton

Enclosure: 2013 Emission Statement
Finishing Emissions Summary
Emission Statement Certification
Document Certification

DEQ

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

2013 EMISSION STATEMENT

Please correct any errors in the information below (cross out & replace)

FACILITY NAME MASCO CABINETRY LIMITED LIABILITY - CULPEPER	***REGISTRATION #*** 40728	***CONTACT PERSON*** BONNIE WHARTON	
LOCATION ADDRESS 641 Maddox Dr Culpeper VA		***JURISDICTION*** Culpeper County	
MAILING ADDRESS 641 Maddox Dr	***MAILING CITY AND STATE*** Culpeper VA	***ZIPCODE*** 22701	
OWNER NAME Masco Cabinetry LLC	***TELEPHONE NUMBER*** 5407277845	***PRIMARY NAICS CODE*** 337110	*For Agency Use Only* *Title V Major*

FACILITY TOTALS *(Sum emissions from attached pages)*

	ANNUAL	OZONE SEASON
TOTAL VOC EMISSIONS FOR 2013	162.45 ✓ TONS/YR	1270.22 LBS/DAY
TOTAL NO_x EMISSIONS FOR 2013	9.2631 ✓ TONS/YR	131.07 LBS/DAY
TOTAL SO_2 EMISSIONS FOR 2013	.5507 ✓ TONS/YR	NA
TOTAL PM_{10} EMISSIONS FOR 2013	2.235 ✓ TONS/YR	NA
TOTAL PB EMISSIONS FOR 2013	N/A TONS/YR	NA
TOTAL TRS EMISSIONS FOR 2013	N/A TONS/YR	NA
TOTAL TNMOC EMISSIONS FOR 2013 (landfills only)	N/A TONS/YR	NA
TOTAL non-VOC/non-PM HAP EMISSIONS FOR 2013	27.01 ✓ TONS/YR	NA
TOTAL CO EMISSIONS FOR 2013	7.7242 ✓ TONS/YR	NA
TOTAL $PM_{2.5}$ EMISSIONS FOR 2013	2.2357 ✓ TONS/YR	NA
TOTAL NH3 EMISSIONS FOR 2013	N/A TONS/YR	NA

PLEASE ATTACH "ANNUAL UPDATE" FORM.
PLEASE ATTACH "EMISSION STATEMENT CERTIFICATION" with appropriate signature.

Finishing Emissions Daily Avg / Product Usage Summary

Chemical Usage and Emission Summary
Printed on 04/08/2014

Permit ID 40728 **Masco Cabinetry**

1 Emission sources queried in this report's data:

Facility ID	Source ID	Description	(2) Transfer Eff.	(2) PM Ctrl Eff.	VOC Ctrl.	(3) Control Eff.	(4) Hrs. Of Oper.	VOC Capt. Eff.	PM Capt. Eff	Bldg. PM Capt. Eff.
Culpeper Plt	Culpe_Line-1	Up to 14 coating booths with associated production conveyor systems, and 2 offline coating booths	65.00%	98.00%	NA	NA		100.00%	100.00%	100.00%

1 The data used to calculate emissions is specific to each source setup. However, only the most recent setup is displayed for the above sources.

2 Transfer, PM and VOC Efficiencies apply only to Finishing Sources.

3 Total Control Efficiency is shown for Boilers and Wood Dust.

4 NA indicates that no schedule has been set up.

Start Date : 01/01/2013
End Date : 12/31/2013
By Source : Yes
By Department: Yes
By Facility : Yes
Regulation 1 : VOC
Regulation 2 : HAPS
Regulation 3 : VHAPS
Regulation 4 : SARA313
Regulation 5 : SARA312
Show all chemicals
Do Not Include HazWaste adjustments
Detailed Info: No
Avg. Days : 255
Detailed Chemical Names: No
Display Source Info: Yes
Display Params info: Yes
Use VOC control efficiency in calculations: Yes
Use PM control efficiency in calculations: Yes
Use building PM control efficiency in calculations: Yes

Department Name DefaultDept

Application System ID Culpe_Line-1 Up to 14 coating booths with associated production conveyor systems, and 2 offline coating booths

Calculation Method
VOC - VendorValues
HAP - MaxValues
VHAP - MaxValues
Solids - VendorValues

Application Method : HVLP Spray Guns

Product Summary

Regular Product Usage	Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used(lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used(lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid
210-W6V-648	4,416.00	20,655.78	144.59	22,222.29	22,222.29	1.08	3,337.98	3,337.98	0.16	3,337.98	3,337.98	0.16
210-W6V-697	3,326.00	15,541.39	108.79	16,740.13	16,740.13	1.08	2,519.55	2,519.55	0.16	2,519.55	2,519.55	0.16
367-D6V-1798	637.00	147.05	1.03	945.81	945.81	6.43	0.00	0.00	0.00	0.00	0.00	0.00
367-D6V-1809	375.00	19.35	0.14	33.75	33.75	1.74	0.00	0.00	0.00	0.00	0.00	0.00
371-D6V-1385-A	854.00	169.31	1.19	3,799.28	3,799.28	22.44	16.42	16.42	9.698E-02	16.42	16.42	9.698E-02
371-D6V-1395	1,063.00	186.42	1.30	3,697.26	3,697.26	19.83	21.36	21.36	0.11	21.36	21.36	0.11
371-W6V-1185-B	528.00	476.75	3.34	1,830.58	1,830.58	3.84	50.85	50.85	0.11	50.85	50.85	0.11

Finishing Emissions Daily Avg / Product Usage Summary

Printed on 04/08/2014

	Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used(lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used(lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid
373-W6V-2049	11,049.00	47,405.80	331.84	59,080.18	59,080.18	1.25	10,907.01	10,907.01	0.23	10,907.01	10,907.01	0.23
373-Y6V-1941	0.00	0.00	0.00	0.00	0.00	NA	0.00	0.00	NA	0.00	0.00	NA
480-X6-2298	5.00	0.00	0.00	34.60	34.60	NA	5.60	5.60	NA	5.60	5.60	NA
480-X6V-2355	321.00	0.00	0.00	2,181.26	2,181.26	NA	43.16	43.16	NA	43.16	43.16	NA
506-D6V-1096-A	1,407.00	185.52	1.30	7,465.18	7,465.18	40.24	175.40	1.23	0.95	0.00	0.00	0.00
506-D6V-1097-A	1,097.00	143.70	1.01	6,831.79	6,831.79	47.54	144.60	2.19	1.01	1.21	1.21	8.397E-03
506-D6V-1149	482.00	6.39	4.474E-02	3,168.26	3,168.26	495.71	6.29	4.406E-02	0.98	0.00	0.00	0.00
506-D6V-1160-A	870.00	47.99	0.34	3,692.81	3,692.81	76.96	69.51	21.65	1.45	21.31	21.31	0.44
506-D6V-1272	896.00	54.99	0.38	3,722.70	3,722.70	67.69	55.21	0.39	1.00	0.00	0.00	0.00
506-D6V-1404	187.00	19.27	0.13	958.99	958.99	49.76	32.48	13.34	1.69	13.20	13.20	0.68
506-D6V-829-C	703.00	47.97	0.34	2,021.31	2,021.31	42.13	49.43	0.35	1.03	0.00	0.00	0.00
506-D6V-835	274.00	3.98	2.788E-02	918.17	918.17	230.54	4.04	2.825E-02	1.01	0.00	0.00	0.00
506-D6V-844	563.00	0.74	5.194E-03	3,710.17	3,710.17	5,000.00	0.84	5.854E-03	1.13	0.00	0.00	0.00
50-C6-3025	113.00	586.47	4.11	390.98	390.98	0.67	390.98	390.98	0.67	390.98	390.98	0.67
50-F6V-1840	15.00	17.39	0.12	101.59	101.59	5.84	0.00	0.00	0.00	0.00	0.00	0.00
542-C6V-5456	2.00	0.17	1.196E-03	12.72	12.72	74.46	0.00	0.00	0.00	0.00	0.00	0.00
542-D6V-5211	853.00	106.71	0.75	5,373.90	5,373.90	50.36	9.37	9.37	8.776E-02	9.37	9.37	8.776E-02
542-D6V-5212	626.00	483.23	3.38	3,894.97	3,894.97	8.06	160.13	160.13	0.33	160.13	160.13	0.33
542-D6V-5299-A	719.00	1,213.38	8.49	4,252.96	4,252.96	3.51	192.45	192.45	0.16	192.45	192.45	0.16
542-D6V-5350	732.00	1,716.88	12.02	3,696.60	3,696.60	2.15	117.12	117.12	6.822E-02	117.12	117.12	6.822E-02
542-D6V-5431	359.00	150.71	1.05	2,301.41	2,301.41	15.27	44.41	42.55	0.29	42.55	42.55	0.28
542-D6V-5622	896.00	814.77	5.70	5,475.99	5,475.99	6.72	254.11	230.26	0.31	230.09	230.09	0.28
542-D6V-5815	637.00	227.60	1.59	3,988.89	3,988.89	17.53	36.15	36.15	0.16	36.15	36.15	0.16
542-D6V-5906	5.75	3.59	2.513E-02	35.82	35.82	9.98	0.63	0.63	0.18	0.63	0.63	0.18
542-D6V-5907	32.25	15.63	0.11	205.93	205.93	13.17	4.05	4.05	0.26	4.05	4.05	0.26
542-D6V-5924	49.00	12.81	8.964E-02	316.58	316.58	24.72	4.34	4.28	0.34	4.28	4.28	0.33
542-D6V-6197	224.00	128.58	0.90	1,359.74	1,359.74	10.57	12.29	12.29	9.556E-02	12.29	12.29	9.556E-02
542-D6V-6198	275.00	284.12	1.99	1,610.54	1,610.54	5.67	16.81	16.81	5.915E-02	16.81	16.81	5.915E-02
542-D6V-6199	215.00	193.36	1.35	1,250.14	1,250.14	6.47	0.78	0.78	4.026E-03	0.78	0.78	4.026E-03
548-B6V-3509-A	640.00	694.46	4.86	3,802.17	3,802.17	5.48	33.15	33.15	4.774E-02	33.15	33.15	4.774E-02
548-D6V-3504	360.00	62.39	0.44	2,355.95	2,355.95	37.76	3.38	3.38	5.424E-02	3.38	3.38	5.424E-02
548-D6V-3505-A	568.00	104.56	0.73	3,680.64	3,680.64	35.20	5.68	5.68	5.432E-02	5.68	5.68	5.432E-02
548-D6V-3560-A	764.00	422.05	2.95	4,805.56	4,805.56	11.39	7.64	7.64	1.810E-02	7.64	7.64	1.810E-02
548-D6V-3728	723.00	243.85	1.71	4,663.35	4,663.35	19.12	14.46	0.10	5.930E-02	3.54	3.54	1.451E-02
548-W6V-3506	355.00	46.36	0.32	2,330.50	2,330.50	50.27	3.33	3.33	7.193E-02	3.33	3.33	7.193E-02
625-B6V-396	114.00	321.61	2.25	117.45	117.45	0.37	3.64	0.51	1.132E-02	0.48	0.48	1.502E-03

Finishing Emissions Daily Avg / Product Usage Summary

Printed on 04/08/2014

	Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used(lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used(lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid
625-D6V-398	127.00	361.12	2.53	132.41	132.41	0.37	4.88	8.458E-02	1.350E-02	5.307E-02	5.307E-02	1.470E-04
625-D6V-421	164.00	501.35	3.51	195.09	195.09	0.39	10.28	0.30	2.051E-02	0.23	0.23	4.580E-04
625-W6V-395	154.00	609.09	4.26	202.94	202.94	0.33	0.00	0.00	0.00	0.00	0.00	0.00
625-W6V-527	202.00	1,215.51	8.51	250.04	250.04	0.21	4.906E-02	4.906E-02	4.036E-05	4.906E-02	4.906E-02	4.036E-05
644-C6-6	115.00	4.79	3.353E-02	1.15	1.15	0.24	0.00	0.00	0.00	0.00	0.00	0.00
830-40L6V-2498	13,479.00	37,864.56	265.05	67,312.78	67,312.78	1.78	14,165.53	14,165.53	0.37	14,165.53	14,165.53	0.37
830-40L6V-2908	1,295.00	4,107.79	28.75	6,160.70	6,160.70	1.50	1,540.45	1,540.45	0.38	1,540.45	1,540.45	0.38
830-PJ6-2479	840.00	4,901.10	34.31	2,709.34	2,709.34	0.55	1,407.92	1,407.92	0.29	1,407.92	1,407.92	0.29
830-PJ6V-2766	360.00	1,349.80	9.45	1,516.45	1,516.45	1.12	0.00	0.00	0.00	0.00	0.00	0.00
831-35L6V-573	3,142.00	7,933.92	55.54	16,172.19	16,172.19	2.04	2,616.34	2,616.34	0.33	2,616.34	2,616.34	0.33
920-W6V-1526	369.00	245.60	1.72	2,288.00	2,288.00	9.32	108.61	108.61	0.44	108.61	108.61	0.44
Acetone	754.00	0.00	0.00	0.00	0.00	NA	0.00	0.00	NA	0.00	0.00	NA
BC-05	628.00	1,662.54	11.64	872.92	872.92	0.53	3.99	3.99	2.402E-03	3.99	3.99	2.402E-03
Mineral Spirit 66/3	528.00	0.00	0.00	3,400.32	3,400.32	NA	0.00	0.00	NA	0.00	0.00	NA
SB-129	2,262.00	0.00	0.00	15,964.78	15,964.78	NA	15,964.79	15,964.79	NA	15,964.79	15,964.79	NA
WO-12	1,374.00	0.00	0.00	7,638.77	7,638.77	NA	0.00	0.00	NA	0.00	0.00	NA
Total Regular Usage	64,123.00	153,720.29	1,076.04	323,896.77	323,896.77	2.11	54,577.46	54,020.83	0.36	54,020.48	54,020.48	0.35
Daily Average	251.46	602.82	4.22	1,270.18	1,270.18		214.03	211.85		211.85	211.85	
Application System Grand Total	**64,123.00**	**153,720.29**	**1,076.04**	**323,896.77**	**323,896.77**	**2.11**	**54,577.46**	**54,020.83**	**0.36**	**54,020.48**	**54,020.48**	**0.35**
Daily Average	251.46	602.82	4.22	1,270.18	1,270.18		214.03	211.85		211.85	211.85	
Total VOC-Exempt Chemicals				23,507.90	23,496.30							
Daily Average				92.19	92.14							

The highlighted fields represent inconsistencies in product data.

Application System Component Summary

CAS #	Chemical Name	Used (lb)	Daily Avg. Use (lb)	Emissions Fugitive (lb)	Daily Avg Emissions (lb)	VOC	HAPS	VHAPS	SARA313	SARA312
Specific Chemicals										
0000050-00-0	FORMALDEHYDE	86.17	0.34	86.17	0.34	☑	☑	☑	☑	☑
0000057-55-6	PROPYLENE GLYCOL	847.80	3.32	847.80	3.32	☑	☐	☐	☐	☑
0000064-02-8	EDTA TETRASODIUM SALT	16.30	6.392E-02	0.11	4.314E-04	☐	☐	☐	☐	☑
0000064-17-5	ETHYL ALCOHOL	51,604.93	202.37	51,604.93	202.37	☑	☐	☐	☐	☑
0000067-56-1	METHANOL[*]	4,087.97	16.03	4,087.97	16.03	☑	☑	☑	☑	☑
0000067-63-0	ISOPROPYL ALCOHOL[*]	14,841.97	58.20	14,841.97	58.20	☑	☐	☐	☑	☑
0000071-23-8	PROPYL ALCOHOL	171.20	0.67	171.20	0.67	☑	☐	☐	☐	☑
0000071-36-3	N-BUTYL ALCOHOL	4,226.18	16.57	4,226.18	16.57	☑	☐	☐	☑	☑
0000072-48-0	ANTHRAQUINONE BASED PIGMENT	312.31	1.22	2.19	8.588E-03	☐	☐	☐	☐	☑

0000078-83-1	ISOBUTYL ALCOHOL	24,671.33	96.75	24,671.33	96.75	☒	☐	☐	☐	☒
0000078-93-3	METHYL ETHYL KETONE	10,267.84	40.27	10,267.84	40.27	☒	☐	☐	☐	☒
0000091-20-3	NAPHTHALENE	1.75	6.863E-03	1.75	6.863E-03	☒	☒	☒	☒	☒
0000095-63-6	1,2,4-TRIMETHYLBENZENE	5,902.77	23.15	5,902.77	23.15	☒	☐	☐	☒	☒
0000096-29-7	2-BUTANONE OXIME	11.98	4.698E-02	11.98	4.698E-02	☒	☐	☐	☐	☒
0000098-82-8	CUMENE	276.68	1.09	276.68	1.09	☒	☒	☒	☒	☒
0000100-41-4	ETHYLBENZENE[*]	5,295.41	20.77	5,295.41	20.77	☒	☒	☒	☒	☒
0000100-42-5	STYRENE	6.93	2.718E-02	6.93	2.718E-02	☒	☒	☒	☒	☒
0000104-15-4	P-TOLUENESULFONIC ACID	4,178.11	16.38	29.25	0.11	☐	☐	☐	☐	☒
0000107-66-4	DIBUTYL PHOSPHATE	674.93	2.65	4.72	1.851E-02	☐	☐	☐	☐	☒
0000107-66-4	DIBUTYL ACID PHOSPHATE	674.93	2.65	4.72	1.851E-02	☐	☐	☐	☐	☒
0000107-87-9	METHYL PROPYL KETONE	32,670.94	128.12	32,670.94	128.12	☒	☐	☐	☐	☒
0000107-98-2	PROPYLENE GLYCOL MONOMETHYL ETHER	600.25	2.35	600.25	2.35	☒	☐	☐	☐	☒
0000108-10-1	METHYL ISOBUTYL KETONE	2,162.62	8.48	2,162.62	8.48	☒	☒	☒	☒	☒
0000108-21-4	ISOPROPYL ACETATE	913.04	3.58	913.04	3.58	☒	☐	☐	☐	☒
0000108-65-6	PROPYLENE GLYCOL MONOMETHYL ETHER ACETATE	3,368.09	13.21	3,368.09	13.21	☒	☐	☐	☐	☒
0000108-83-8	DIISOBUTYL KETONE	911.89	3.58	911.89	3.58	☒	☐	☐	☐	☒
0000108-88-3	TOLUENE	16,363.51	64.17	16,363.51	64.17	☒	☒	☒	☒	☒
0000109-60-4	N-PROPYL ACETATE[*]	4,988.23	19.57	4,988.23	19.57	☒	☐	☐	☐	☒
0000110-12-3	METHYL ISOAMYL KETONE	434.59	1.70	434.59	1.70	☒	☐	☐	☐	☒
0000110-19-0	ISO-BUTYL ACETATE	5,511.92	21.62	5,511.92	21.62	☒	☐	☐	☐	☒
0000110-43-0	METHYL N-AMYL KETONE	8,571.09	33.61	8,571.09	33.61	☒	☐	☐	☐	☒
0000111-42-2	DIETHANOLAMINE	0.81	3.176E-03	0.81	3.176E-03	☒	☒	☒	☒	☒
0000111-46-6	DIETHYLENE GLYCOL	36.57	0.14	36.57	0.14	☒	☐	☐	☐	☒
0000111-66-0	1-OCTENE	0.53	2.078E-03	0.53	2.078E-03	☒	☐	☐	☐	☒
0000111-76-2	ETHYLENE GLYCOL MONOBUTYL ETHER	804.86	3.16	804.86	3.16	☒	☐	☐	☒	☒
0000112-02-7	HEXADECYLTRIMETHYLAMMONIUM CL	5.817E-03	2.281E-05	4.072E-05	1.597E-07	☐	☐	☐	☐	☒
0000123-19-3	4-HEPTANONE	4,175.81	16.38	4,175.81	16.38	☒	☐	☐	☐	☒
0000123-86-4	BUTYL ACETATE	38,615.00	151.43	38,615.00	151.43	☒	☐	☐	☐	☒
0000124-68-5	2-AMINO-2-METHYL-1-PROPANOL	0.33	1.294E-03	0.33	1.294E-03	☒	☐	☐	☐	☒
0000132-27-4	SODIUM O-PHENYLPHENOXIDE	6.679E-03	2.619E-05	4.675E-05	1.833E-07	☐	☐	☐	☒	☒
0000139-13-9	NITRILOTRIACETIC ACID	0.41	1.608E-03	0.41	1.608E-03	☒	☐	☐	☒	☒
0000147-14-8	PHTHALOCYANINE BLUE	0.37	1.451E-03	2.595E-03	1.018E-05	☐	☐	☐	☒	☒
0000540-88-5	TERT-BUTYL ACETATE	1,064.94	4.18	1,064.94	4.18	☒	☐	☐	☐	☒
0000541-85-5	5-METHYL-3-HEPTANONE	1,340.63	5.26	1,340.63	5.26	☒	☐	☐	☐	☒
0000546-93-0	MAGNESIUM CARBONATE[*]	24.91	9.769E-02	0.17	6.667E-04	☐	☐	☐	☐	☒
0000701-64-4	MONOPHENYL PHOSPHORIC ACID	684.94	2.69	4.79	1.878E-02	☐	☐	☐	☐	☒
0001047-16-1	QUINACRIDONEPIGMENT	51.43	0.20	0.36	1.412E-03	☐	☐	☐	☐	☒
0001103-39-5	ACID AZO CALCIUM SALT[*]	0.38	1.490E-03	2.682E-03	1.052E-05	☐	☐	☐	☐	☒
0001309-37-1	FERRIC OXIDE	757.99	2.97	5.31	2.082E-02	☐	☐	☐	☐	☒

0001310-73-2	SODIUM HYDROXIDE	0.81	3.176E-03	5.704E-03	2.237E-05	☐	☐	☐	☐	☒
0001313-13-9	MANGANESE DIOXIDE	15.90	6.235E-02	0.11	4.314E-04	☐	☒	☐	☒	☒
0001317-34-6	MANGANESE TRIOXIDE	37.39	0.15	0.26	1.020E-03	☐	☒	☐	☒	☒
0001317-65-3	CALCIUM CARBONATE	3.832E-03	1.503E-05	2.682E-05	1.052E-07	☐	☐	☐	☐	☒
0001318-59-8	CHLORITE	230.56	0.90	1.61	6.314E-03	☐	☐	☐	☐	☒
0001330-20-7	XYLENE[*]	22,681.45	88.95	22,681.45	88.95	☒	☒	☒	☒	☒
0001332-37-2	YELLOW IRON OXIDE	148.03	0.58	1.04	4.078E-03	☐	☐	☐	☐	☒
0001332-58-7	KAOLIN	957.40	3.75	6.70	2.627E-02	☐	☐	☐	☐	☒
0001333-86-4	CARBON BLACK	215.65	0.85	1.51	5.922E-03	☐	☐	☐	☐	☒
0001344-28-1	ALUMINUM OXIDE	15.90	6.235E-02	0.11	4.314E-04	☐	☐	☐	☒	☒
0001589-47-5	2-METHOXY-1-PROPANOL	1.75	6.863E-03	1.75	6.863E-03	☒	☐	☐	☐	☒
0001823-15-0	BUTYL ACID PHOSPHATE	674.93	2.65	4.72	1.851E-02	☐	☐	☐	☐	☒
0001623-15-0	MONOBUTYL PHOSPHORIC ACID	674.93	2.65	4.72	1.851E-02	☐	☐	☐	☐	☒
0002786-76-7	NAPHTHANIL RED	44.40	0.17	0.31	1.216E-03	☐	☐	☐	☐	☒
0005102-83-0	DIAZO PIGMENT	1.23	4.824E-03	8.580E-03	3.365E-05	☐	☐	☐	☐	☒
0006358-85-6	DIARYANILIDE YELLOW[*]	26.97	0.11	0.19	7.451E-04	☐	☐	☐	☐	☒
0006471-49-4	NITRO ANISIDINE/ANILIDE BON A	0.65	2.549E-03	4.567E-03	1.791E-05	☐	☐	☐	☐	☒
0007440-44-0	CARBON	76.19	0.30	0.53	2.078E-03	☐	☐	☐	☐	☒
0007631-86-9	SILICA, AMORPHOUS	2,940.46	11.53	20.58	8.071E-02	☐	☐	☐	☐	☒
0007664-41-7	AMMONIA	39.59	0.16	39.59	0.16	☐	☐	☐	☒	☒
0007664-93-9	SULFURIC ACID	38.05	0.15	0.27	1.059E-03	☐	☐	☐	☒	☒
0007727-43-7	BARIUM SULFATE	39.18	0.15	0.27	1.059E-03	☐	☐	☐	☐	☒
0007732-18-5	WATER	6,639.34	26.04	6,639.34	26.04	☐	☐	☐	☐	☐
0007757-82-6	SODIUM SULFATE	9.95	3.902E-02	6.968E-02	2.733E-04	☐	☐	☐	☐	☒
0007758-87-4	TRICALCIUM PHOSPHATE	658.89	2.58	4.61	1.808E-02	☐	☐	☐	☐	☒
0008001-79-4	CASTOR OIL	35.73	0.14	0.25	9.804E-04	☐	☐	☐	☐	☒
0008002-43-5	SOYBEAN LECITHIN	2.761E-02	1.083E-04	1.932E-04	7.576E-07	☐	☐	☐	☐	☒
0008030-76-0	SOYBEAN LECITHIN (UNBLEACHED)	53.19	0.21	0.37	1.451E-03	☐	☐	☐	☐	☒
0008032-32-4	NAPHTHA, VM&P	11.53	4.522E-02	11.53	4.522E-02	☒	☐	☐	☐	☒
0008050-09-7	ROSIN	5.95	2.333E-02	4.162E-02	1.632E-04	☐	☐	☐	☐	☒
0008052-41-3	STODDARD SOLVENT[*]	7,272.07	28.52	7,272.07	28.52	☒	☐	☐	☐	☒
0009002-88-4	POLYETHYLENE	9.95	3.902E-02	6.968E-02	2.733E-04	☐	☐	☐	☐	☒
0009004-35-8	CELLULOSE ACETATE BUTYRATE	5,727.84	22.46	40.09	0.16	☐	☐	☐	☐	☒
0009007-13-0	CALCIUM RESINATE	9.053E-02	3.550E-04	6.337E-04	2.485E-06	☐	☐	☐	☐	☒
0009016-45-9	POLYETHYLENE MONO(NONYLPHENYL GLYCOL ETHER(NO	1.17	4.588E-03	8.198E-03	3.215E-05	☐	☐	☐	☐	☒
0009036-19-5	T-DET C08	0.84	3.294E-03	5.868E-03	2.301E-05	☐	☐	☐	☐	☒
0012002-43-6	GILSONITE	8.18	3.208E-02	5.729E-02	2.247E-04	☐	☐	☐	☐	☒
0013463-67-7	TITANIUM DIOXIDE	42,424.26	166.37	296.97	1.16	☐	☐	☐	☐	☒
0014807-96-6	TALC	9,345.11	36.65	65.42	0.26	☐	☐	☐	☐	☒
0014808-60-7	SILICA, CRYSTALLINE[*]	602.57	2.36	4.22	1.655E-02	☐	☐	☐	☐	☒
0016389-88-1	Dolomite (CaMg(CO3)2)	89.27	0.35	0.62	2.431E-03	☐	☐	☐	☐	☒

0020344-49-4	iron oxide	10.94	4.290E-02	7.661E-02	3.004E-04	☐	☐	☐	☐	☒
0021645-51-2	ALUMINUM HYDROXIDE	1,014.55	3.98	7.10	2.784E-02	☐	☐	☐	☐	☒
0025119-62-4	STYRENE/ALLYL ALCOHOL RESIN	1,500.28	5.88	10.50	4.118E-02	☐	☐	☐	☐	☒
0025212-88-8	METHACRYLIC ACID, POLYMER W/ ETHYL ACRYLATE	65.88	0.26	0.46	1.804E-03	☐	☐	☐	☐	☒
0025322-68-3	POLYETHYLENE GYLCOL	8.495E-02	3.331E-04	5.947E-04	2.332E-06	☐	☐	☐	☐	☒
0025322-69-4	POLYOXYPROPYLENE GLYCOL	35.78	0.14	0.25	9.804E-04	☐	☐	☐	☐	☒
0025973-55-1	BENZOTRIAZOLE	457.95	1.80	3.21	1.259E-02	☐	☐	☐	☐	☒
0027323-41-7	TRIETHANOLAMINE DODECYLBENZENE SULFONATE	0.36	1.412E-03	2.527E-03	9.910E-06	☐	☐	☐	☐	☒
0031837-42-0	PIGMENT YELLOW 151	0.19	7.451E-04	1.320E-03	5.176E-06	☐	☐	☐	☐	☒
0034590-94-8	DIPROPYLENE GLYCOL MONOMETHYL ETHER	28.33	0.11	28.33	0.11	☒	☐	☐	☐	☒
0051200-87-4	DIMETHYLOXAZOLIDINE	13.57	5.322E-02	9.501E-02	3.726E-04	☐	☐	☐	☐	☒
0051274-00-1	YELLOW IRON OXIDE	51.54	0.20	0.36	1.412E-03	☐	☐	☐	☐	☒
0053710-52-4	2-Propenoic acid, 2-hydroxypropyl ester, polymer with chloroethene	232.03	0.91	1.62	6.353E-03	☐	☐	☐	☐	☒
0053980-88-4	C21 DICARBOXYLIC FATTY ACID	322.24	1.26	322.24	1.26	☒	☐	☐	☐	☒
0060864-33-7	ALKYL ARYL POLYETHER	4.74	1.859E-02	3.319E-02	1.302E-04	☐	☐	☐	☐	☒
0061790-12-3	TALL OIL	2.761E-02	1.083E-04	1.932E-04	7.578E-07	☐	☐	☐	☐	☒
0061791-12-6	CREMOPHOR EL	11.72	4.596E-02	11.72	4.596E-02	☒	☐	☐	☐	☒
0063231-60-7	microcrystalline waxes	37.41	0.15	0.26	1.020E-03	☐	☐	☐	☐	☒
0064742-42-3	CLAY TREATED MICROCRYSTALLINE WAX	232.51	0.91	1.63	6.392E-03	☐	☐	☐	☐	☒
0064742-47-8	ISOPARAFFINIC PETROLEUM DISTILLATE[*]	282.06	1.11	282.06	1.11	☒	☐	☐	☐	☒
0064742-48-9	NAPHTHA, HEAVY HYDROTREATED (PETROLEUM)	3.87	1.518E-02	3.87	1.518E-02	☒	☐	☐	☐	☒
0064742-49-0	VM & P NAPHTHA	9,111.10	35.73	9,111.10	35.73	☒	☐	☐	☐	☒
0064742-88-7	MEDIUM MINERAL SPIRITS[*]	17,805.53	69.83	17,805.53	69.83	☒	☐	☐	☐	☒
0064742-89-8	ALIPHATIC, LIGHT HYDROCARBON SOLVENT[*]	6,632.30	26.01	6,632.30	26.01	☒	☐	☐	☐	☒
0065997-06-0	ROSIN, PARTIALLY HYDROGENATED	4.235E-02	1.661E-04	2.965E-04	1.163E-06	☐	☐	☐	☐	☒
0068002-18-6	ISOBUTYLATE U/F RESIN	6,834.42	26.80	47.84	0.19	☐	☐	☐	☐	☒
0068002-19-7	BUTYLATED U/F RESIN	3,470.84	13.61	24.29	9.525E-02	☐	☐	☐	☐	☒
0068036-31-3	ROSIN MOD. TALL OIL FA ALKYD	2.07	8.118E-03	1.449E-02	5.682E-05	☐	☐	☐	☐	☒
0068186-34-5	MODIFIED ALKYLPHOSPHATE ESTER	5.42	2.125E-02	3.794E-02	1.488E-04	☐	☐	☐	☐	☒
0068475-37-6	GLYCERIN ESTER/POLYMER ROSIN	116.94	0.46	0.82	3.216E-03	☐	☐	☐	☐	☒
0068515-48-0	PHTHALATE ESTERS	97.40	0.38	0.68	2.667E-03	☐	☐	☐	☐	☒
0068953-58-2	QUARTERNARY AMMONIUM CPDS, BIS (HYDROGENATED TALLOW ALKYL) DIMETHYL-SALT	639.44	2.51	4.48	1.757E-02	☐	☐	☐	☐	☒
0070131-67-8	METHYL SILOXANE LINEAR/CYCLIC	3.73	1.463E-02	3.73	1.463E-02	☒	☐	☐	☐	☒
0070657-70-4	2-METHOXY-1-PROPANOL ACETATE	8.79	3.447E-02	8.79	3.447E-02	☒	☐	☐	☐	☒
0071566-54-6	PIGMENT	0.93	3.647E-03	6.489E-03	2.545E-05	☐	☐	☐	☐	☒

0075673-43-7	075673-43-7 - Please call ERA Environmental Consulting for details concerning this chemical	0.33	1.294E-03	2.306E-03	9.043E-06	☐	☐	☐	☐	☒
0085099-25-8	MOD AMMONIUM DI.H PHOSPHATE	234.23	0.92	1.64	6.431E-03	☐	☐	☐	☐	☒
0085711-34-8	MOD AMIDES, TALL-OIL PHOSPHATE	95.13	0.37	0.67	2.627E-03	☐	☐	☐	☐	☒
0085828-89-3	CHROME (III) AZO DYE	324.43	1.27	2.27	8.902E-03	☐	☒	☐	☒	☒
0112926-00-8	SILICA - PRECIPITATED	489.12	1.92	3.42	1.341E-02	☐	☐	☐	☐	☒
0114653-42-8	VINYL CHLORIDE COPOLYMER	9,283.38	36.41	64.98	0.25	☐	☐	☐	☐	☒
UNKNOWN	ACRYLIC RESIN	2,977.03	11.67	20.84	8.173E-02	☐	☐	☐	☐	☒
UNKNOWN	ALIPHATIC HYDROCARBON	281.58	1.10	281.58	1.10	☒	☐	☐	☐	☒
UNKNOWN	ALKYD	10,256.03	40.22	71.79	0.28	☐	☐	☐	☐	☒
UNKNOWN	ALKYD RESIN	821.10	3.22	5.75	2.255E-02	☐	☐	☐	☐	☒
UNKNOWN	AROMATIC SOLVENT	11,728.32	45.99	11,728.32	45.99	☒	☐	☐	☐	☒
UNKNOWN	AZO PIGMENT	1.62	6.353E-03	1.132E-02	4.439E-05	☐	☐	☐	☐	☒
UNKNOWN	CHROMIUM III COMPLEX DYE	153.98	0.60	1.08	4.235E-03	☐	☒	☐	☒	☒
UNKNOWN	CHROMIUM III COMPOUND	22.39	8.780E-02	0.16	6.275E-04	☐	☒	☐	☒	☒
UNKNOWN	CLAY	166.84	0.65	1.17	4.588E-03	☐	☐	☐	☐	☒
UNKNOWN	COCONUT ALKYD	25,273.11	99.11	176.91	0.69	☐	☐	☐	☐	☒
UNKNOWN	DIARYLIDE PIGMENT	47.61	0.19	0.33	1.294E-03	☐	☐	☐	☐	☒
UNKNOWN	EPOXY	0.22	8.627E-04	1.545E-03	6.059E-06	☐	☐	☐	☐	☒
UNKNOWN	FATTY ACID	42.00	0.16	0.29	1.137E-03	☐	☐	☐	☐	☒
UNKNOWN	FATTY ACID AMIDE	66.46	0.26	0.47	1.843E-03	☐	☐	☐	☐	☒
UNKNOWN	FLUROALIPHATIC POLYMERIC ESTER	0.18	7.059E-04	1.226E-03	4.808E-06	☐	☐	☐	☐	☒
UNKNOWN	HYDROCARBON OIL	2.30	9.020E-03	1.611E-02	6.318E-05	☐	☐	☐	☐	☐
UNKNOWN	MELAMINE-FORMALDEHYDE RESIN	12,721.56	49.89	89.05	0.35	☐	☐	☐	☐	☒
UNKNOWN	NONHAZARDOUS INGREDIENT	17.34	6.800E-02	0.12	4.706E-04	☐	☐	☐	☐	☒
UNKNOWN	NON-HAZARDOUS SOLID	2.44	9.569E-03	1.708E-02	6.698E-05	☐	☐	☐	☐	☐
UNKNOWN	ORGANIC	347.65	1.36	2.43	9.529E-03	☐	☐	☐	☐	☒
UNKNOWN	PIGMENT	7.96	3.122E-02	5.572E-02	2.185E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYAMINE AMIDE SALT	15.02	5.890E-02	0.11	4.314E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYAMINOAMIDE SALT	0.20	7.843E-04	1.373E-03	5.384E-06	☐	☐	☐	☐	☒
UNKNOWN	POLYCARBOXYLIC ACID NA SALT	16.51	6.475E-02	0.12	4.706E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYESTER BASED BLOCK COPOLYMER	29.89	0.12	0.21	8.235E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYSILOXANE	30.06	0.12	0.21	8.235E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYURETHANE	1.15	4.510E-03	8.053E-03	3.158E-05	☐	☐	☐	☐	☐
UNKNOWN	RESIN	170.72	0.67	1.20	4.706E-03	☐	☐	☐	☐	☒
UNKNOWN	SOYA ALKYD	1,825.94	7.16	12.78	5.012E-02	☐	☐	☐	☐	☒
UNKNOWN	SURFACTANTS	272.48	1.07	1.91	7.490E-03	☐	☐	☐	☐	☒
UNKNOWN	TALL OIL FA ALKYD	17.96	7.043E-02	0.13	5.098E-04	☐	☐	☐	☐	☒
UNKNOWN	VINYL POLYMER	16.52	6.478E-02	0.12	4.706E-04	☐	☐	☐	☐	☒
	Specific Chemicals TOTALS	**480,767.36**	**1,885.36**	**328,774.69**	**1,289.31**					

VOC Exempt										
0000067-64-1	ACETONE[*]	23,496.22	92.14	23,496.22	92.14	☐	☐	☐	☐	☒
0000556-67-2	OCTAMETHYLCYCLOTETRASILO	0.36	1.412E-03	2.527E-03	9.910E-06	☐	☐	☐	☐	☒
0063148-62-9	SILICONE	11.32	4.439E-02	7.927E-02	3.109E-04	☐	☐	☐	☐	☒
	VOC Exempt TOTALS	**23,507.90**	**92.19**	**23,496.30**	**92.14**					
Summary Chemicals and Criteria Chemicals										
Code:N* values represent sum totals of individually reported chemicals in the Toxic Category Code**										
N001	IRON COMPOUNDS	968.50	3.80	6.78	2.659E-02	☐	☐	☐	☐	☒
N080	CHROMIUM COMPOUNDS	500.80	1.96	3.51	1.376E-02	☐	☒	☐	☒	☒
N089	CHROMIUM COMPOUNDS (All)	324.43	1.27	2.27	8.902E-03	☐	☐	☐	☐	☒
N100	COPPER COMPOUNDS	0.37	1.451E-03	2.595E-03	1.018E-05	☐	☐	☐	☒	☒
N101	Copper Compounds_All	0.37	1.451E-03	2.595E-03	1.018E-05	☐	☐	☐	☐	☒
N228	Glycol Ethers, All	804.86	3.16	804.86	3.16	☐	☐	☐	☐	☒
N230	GLYCOL ETHER	804.86	3.16	804.86	3.16	☐	☒	☐	☒	☒
N333	N333_Test Toxic Category_DoNotUse	6.93	2.718E-02	6.93	2.718E-02	☐	☐	☐	☐	☒
N450	MANGANESE COMPOUNDS	53.28	0.21	0.37	1.451E-03	☐	☒	☐	☒	☒
N451	Manganese Compounds_All	53.28	0.21	0.37	1.451E-03	☐	☐	☐	☐	☒
N589	Polycyclic Organic Matter for Formulation Assessment Plan	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N591	(POMTV) Polycyclic Organic Matter (Specific Compounds from OAQPS for TV)	1.75	6.863E-03	1.75	6.863E-03	☐	☒	☐	☐	☒
N593	(16PAH) POLYCYCLIC AROMATIC HYDROCARBONS	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N594	(PAH) POLYCYCLIC AROMATIC HYDROCARBONS	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N610	PHOSPHORUS COMPOUNDS	4,378.17	17.17	30.65	0.12	☐	☐	☐	☐	☒
N620	NONYLPHENOL, ITS ETHOXYLATES AND DERIVATIVES	1.17	4.588E-03	8.198E-03	3.216E-05	☐	☐	☐	☐	☒
N630	OCTYLPHENOL AND ITS ETHOXYLATES	0.84	3.294E-03	5.868E-03	2.301E-05	☐	☐	☐	☐	☒
N642	Siloxanes (Completely Methylated)	11.69	4.584E-02	8.180E-02	3.208E-04	☐	☐	☐	☐	☒
N655	CHROMIUM (III) COMPOUNDS	324.43	1.27	2.27	8.902E-03	☐	☒	☐	☒	☒
N663	ALUMINUM COMPOUNDS	1,987.85	7.80	13.91	5.456E-02	☐	☐	☐	☐	☒
N670	AMMONIUM COMPOUNDS	873.87	3.43	6.12	2.400E-02	☐	☐	☐	☐	☒
N695	TRIMETHYLBENZENE ISOMERS	5,902.77	23.15	5,902.77	23.15	☐	☐	☐	☐	☒
N696	XYLENE ISOMERS	22,681.45	88.95	22,681.45	88.95	☐	☒	☐	☒	☒
N698	MINERAL SPIRITS GROUP 1	31,725.30	124.41	31,725.30	124.41	☐	☐	☐	☐	☒
N699	MINERAL SPIRITS GROUP 2	282.06	1.11	282.06	1.11	☐	☐	☐	☐	☒
N705	AMMONIA AND AMMONIUM ION COMPOUNDS	679.03	2.66	44.06	0.17	☐	☐	☐	☐	☒
N706	PHOSPHORUS TOTAL WITHOUT 7723-14-0	4,378.17	17.17	30.65	0.12	☐	☐	☐	☐	☒
N734	Nonylphenol and its ethoxylates	1.17	4.588E-03	8.198E-03	3.215E-05	☐	☐	☐	☐	☒
N800	MINERAL SPIRITS	32,007.36	125.52	32,007.36	125.52	☐	☐	☐	☐	☒

N831	MANGANESE COMPOUNDS (Inorganic)	53.28	0.21	0.37	1.451E-03	☐	☑	☐	☑	☑
N833	Xylene Isomers (except p-)	22,681.45	88.95	22,681.45	88.95	☐	☑	☐	☑	☑
N866	CHLORIDE COMPOUNDS	639.45	2.51	4.48	1.757E-02	☐	☐	☐	☐	☑
N880	PETROLEUM	16,029.33	62.86	16,029.33	62.86	☐	☐	☐	☐	☐
N903	Ethyl-/ Methyl-Glycols and their Acetates	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☑
N915	Phthalate Compounds	97.40	0.38	0.68	2.667E-03	☐	☐	☐	☐	☑
N999	N999 - test and	145.23	0.57	16.35	6.412E-02	☐	☐	☐	☐	☑
NA-ERAEnviro	HAPS	54,577.46	214.03	54,020.83	211.85	☐	☑	☐	☐	☑
NA-ERAEnviro	PM (TOTAL)	153,720.29	602.82	1,076.04	4.22	☐	☐	☐	☐	☑
NA-ERAEnviro	PM-10 (TOTAL)	153,720.29	602.82	1,076.04	4.22	☐	☐	☐	☐	☑
NA-ERAEnviro	PM-2.5 (TOTAL)	153,720.29	602.82	1,076.04	4.22	☐	☐	☐	☐	☑
NA-ERAEnviro	SARA312	497,630.03	1,951.49	345,631.62	1,355.42	☐	☐	☐	☐	☑
NA-ERAEnviro	SARA313	77,387.47	303.48	76,783.32	301.11	☐	☐	☐	☐	☑
NA-ERAEnviro	VHAPS	54,020.48	211.85	54,020.48	211.85	☐	☐	☐	☐	☑
NA-ERAEnviro	VOC	323,896.77	1,270.18	323,896.77	1,270.18	☑	☐	☐	☐	☑
NA-ERAEnviro	VOC-UNCLASSIFIED	2,872.44	11.26	2,872.44	11.26	☑	☐	☐	☐	☑
	VOC Exempt and Specific Chemicals TOTALS	**504,275.26**	**1,977.55**	**352,270.99**	**1,381.45**					

Legend Chemical State

[*] Multiple chemical names replaced with default name

Department Summary 147 DefaultDept

	(gal)	(lb)	(lb)	(lb)	(lb)		(lb)	(lb)		(lb)	(lb)	
210-W6V-648	4,416.00	20,655.78	144.59	22,222.29	22,222.29	1.08	3,337.98	3,337.98	0.16	3,337.98	3,337.98	0.16
210-W6V-697	3,326.00	15,541.39	108.79	16,740.13	16,740.13	1.08	2,519.55	2,519.55	0.16	2,519.55	2,519.55	0.16
367-D6V-1798	837.00	147.05	1.03	945.81	945.81	6.43	0.00	0.00	0.00	0.00	0.00	0.00
367-D6V-1809	375.00	19.35	0.14	33.75	33.75	1.74	0.00	0.00	0.00	0.00	0.00	0.00
371-D6V-1385-A	654.00	169.31	1.19	3,799.28	3,799.28	22.44	16.42	16.42	9.698E-02	16.42	16.42	9.698E-02
371-D6V-1395	1,083.00	186.42	1.30	3,697.26	3,697.26	19.83	21.36	21.36	0.11	21.36	21.36	0.11
371-W6V-1185-B	528.00	476.75	3.34	1,830.58	1,830.58	3.84	50.85	50.85	0.11	50.85	50.85	0.11
373-W6V-2049	11,049.00	47,405.80	331.84	59,080.18	59,080.18	1.25	10,907.01	10,907.01	0.23	10,907.01	10,907.01	0.23
373-Y6V-1941	0.00	0.00	0.00	0.00	0.00	NA	0.00	0.00	NA	0.00	0.00	NA
480-X6-2288	5.00	0.00	0.00	34.60	34.60	NA	5.60	5.60	NA	5.60	5.60	NA

	(gal)	(lb)	(lb)	(lb)	(lb)		(lb)	(lb)		(lb)	(lb)	
480-X6V-2355	321.00	0.00	0.00	2,181.26	2,181.26	NA	43.16	43.16	NA	43.16	43.16	NA
506-D6V-1096-A	1,407.00	185.52	1.30	7,465.18	7,465.18	40.24	175.40	1.23	0.95	0.00	0.00	0.00
506-D6V-1097-A	1,097.00	143.70	1.01	6,831.79	6,831.79	47.54	144.60	2.19	1.01	1.21	1.21	8.397E-03
506-D6V-1149	482.00	6.39	4.474E-02	3,168.26	3,168.26	495.71	6.29	4.406E-02	0.98	0.00	0.00	0.00
506-D6V-1160-A	870.00	47.99	0.34	3,692.81	3,692.81	76.96	68.51	21.65	1.45	21.31	21.31	0.44
506-D6V-1272	896.00	54.99	0.38	3,722.70	3,722.70	67.69	55.21	0.39	1.00	0.00	0.00	0.00
506-D6V-1404	187.00	19.27	0.13	958.99	958.99	49.76	32.48	13.34	1.69	13.20	13.20	0.68
506-D6V-829-C	703.00	47.97	0.34	2,021.31	2,021.31	42.13	49.43	0.35	1.03	0.00	0.00	0.00
506-D6V-835	274.00	3.98	2.788E-02	918.17	918.17	230.54	4.04	2.825E-02	1.01	0.00	0.00	0.00
506-D6V-844	563.00	0.74	5.194E-03	3,710.17	3,710.17	5,000.00	0.84	5.854E-03	1.13	0.00	0.00	0.00
50-C6-3025	113.00	586.47	4.11	390.98	390.98	0.67	390.98	390.98	0.67	390.98	390.98	0.67
50-F6V-1840	15.00	17.39	0.12	101.59	101.59	5.84	0.00	0.00	0.00	0.00	0.00	0.00
542-C6V-6456	2.00	0.17	1.196E-03	12.72	12.72	74.46	0.00	0.00	0.00	0.00	0.00	0.00
542-D6V-5211	853.00	106.71	0.75	5,373.90	5,373.90	50.36	9.37	9.37	8.776E-02	9.37	9.37	8.776E-02
542-D6V-5212	626.00	483.23	3.38	3,894.97	3,894.97	8.06	160.13	160.13	0.33	160.13	160.13	0.33
542-D6V-5299-A	719.00	1,213.38	8.49	4,252.96	4,252.96	3.51	192.45	192.45	0.16	192.45	192.45	0.16
542-D6V-5350	732.00	1,716.68	12.02	3,696.60	3,696.60	2.15	117.12	117.12	6.822E-02	117.12	117.12	6.822E-02
542-D6V-5431	359.00	150.71	1.05	2,301.41	2,301.41	15.27	44.41	42.55	0.29	42.55	42.55	0.28
542-D6V-5622	896.00	814.77	5.70	5,475.99	5,475.99	6.72	254.11	230.26	0.31	230.09	230.09	0.28
542-D6V-5815	637.00	227.60	1.59	3,988.69	3,988.69	17.53	36.15	36.15	0.16	36.15	36.15	0.16
542-D6V-5906	5.75	3.59	2.513E-02	35.82	35.82	9.98	0.63	0.63	0.18	0.63	0.63	0.18
542-D6V-5907	32.25	15.63	0.11	205.93	205.93	13.17	4.05	4.05	0.26	4.05	4.05	0.26
542-D6V-5924	49.00	12.81	8.964E-02	316.58	316.58	24.72	4.34	4.28	0.34	4.28	4.28	0.33
542-D6V-6197	224.00	126.58	0.90	1,359.74	1,359.74	10.57	12.29	12.29	9.556E-02	12.29	12.29	9.556E-02
542-D6V-6198	275.00	284.12	1.99	1,610.54	1,610.54	5.67	16.81	16.81	5.915E-02	16.81	16.81	5.915E-02
542-D6V-6199	215.00	193.38	1.35	1,250.14	1,250.14	6.47	0.78	0.78	4.026E-03	0.78	0.78	4.026E-03
548-B6V-3509-A	640.00	684.46	4.86	3,802.17	3,802.17	5.48	33.15	33.15	4.774E-02	33.15	33.15	4.774E-02
548-D6V-3504	360.00	62.39	0.44	2,355.95	2,355.95	37.76	3.38	3.38	5.424E-02	3.38	3.38	5.424E-02
548-D6V-3505-A	568.00	104.56	0.73	3,680.64	3,680.64	35.20	5.68	5.68	5.432E-02	5.68	5.68	5.432E-02
548-D6V-3560-A	764.00	422.05	2.95	4,805.56	4,805.56	11.39	7.64	7.64	1.810E-02	7.64	7.64	1.810E-02

Finishing Emissions Daily Avg / Product Usage Summary

Printed on 04/08/2014

	(gal)	(lb)	(lb)	(lb)	(lb)		(lb)	(lb)		(lb)	(lb)	
548-D6V-3728	723.00	243.85	1.71	4,663.35	4,663.35	19.12	14.46	0.10	5.930E-02	3.54	3.54	1.451E-02
548-W6V-3506	355.00	46.36	0.32	2,330.50	2,330.50	50.27	3.33	3.33	7.193E-02	3.33	3.33	7.193E-02
625-B6V-396	114.00	321.61	2.25	117.45	117.45	0.37	3.64	0.51	1.132E-02	0.48	0.48	1.502E-03
625-D6V-398	127.00	361.12	2.53	132.41	132.41	0.37	4.88	8.458E-02	1.350E-02	5.307E-02	5.307E-02	1.470E-04
625-D6V-421	164.00	501.35	3.51	195.09	195.09	0.39	10.28	0.30	2.051E-02	0.23	0.23	4.580E-04
625-W6V-395	154.00	609.09	4.26	202.94	202.94	0.33	0.00	0.00	0.00	0.00	0.00	0.00
625-W6V-527	202.00	1,215.51	8.51	250.04	250.04	0.21	4.906E-02	4.906E-02	4.036E-05	4.906E-02	4.906E-02	4.036E-05
644-C6-6	115.00	4.79	3.353E-02	1.15	1.15	0.24	0.00	0.00	0.00	0.00	0.00	0.00
830-40L6V-2498	13,479.00	37,864.56	265.05	67,312.78	67,312.78	1.78	14,165.53	14,165.53	0.37	14,165.53	14,165.53	0.37
830-40L6V-2908	1,295.00	4,107.79	28.75	6,160.70	6,160.70	1.50	1,540.45	1,540.45	0.38	1,540.45	1,540.45	0.38
830-PJ6-2479	840.00	4,901.10	34.31	2,709.34	2,709.34	0.55	1,407.92	1,407.92	0.29	1,407.92	1,407.92	0.29
830-PJ6V-2766	360.00	1,349.80	9.45	1,516.45	1,516.45	1.12	0.00	0.00	0.00	0.00	0.00	0.00
831-35L6V-573	3,142.00	7,933.92	55.54	16,172.19	16,172.19	2.04	2,616.34	2,616.34	0.33	2,616.34	2,616.34	0.33
920-W6V-1526	369.00	245.60	1.72	2,288.00	2,288.00	9.32	108.61	108.61	0.44	108.61	108.61	0.44
Acetone	754.00	0.00	0.00	0.00	0.00	NA	0.00	0.00	NA	0.00	0.00	NA
BC-05	628.00	1,662.54	11.64	872.92	872.92	0.53	3.99	3.99	2.402E-03	3.99	3.99	2.402E-03
Mineral Spirit 66/3	528.00	0.00	0.00	3,400.32	3,400.32	NA	0.00	0.00	NA	0.00	0.00	NA
SB-129	2,262.00	0.00	0.00	15,964.78	15,964.78	NA	15,964.79	15,964.79	NA	15,964.79	15,964.79	NA
WO-12	1,374.00	0.00	0.00	7,638.77	7,638.77	NA	0.00	0.00	NA	0.00	0.00	NA
	64,123.00	153,720.29	1,076.04	323,896.77	323,896.77	2.11	54,577.46	54,020.83	0.36	54,020.48	54,020.48	0.35
	251.46	602.82	4.22	1,270.18	1,270.18		214.03	211.85		211.85	211.85	
	64,123.00	**153,720.29**	**1,076.04**	**323,896.77**	**323,896.77**	**2.11**	**54,577.46**	**54,020.83**	**0.36**	**54,020.48**	**54,020.48**	**0.35**
	251.46	602.82	4.22	1,270.18	1,270.18		214.03	211.85		211.85	211.85	
				23,507.90	23,496.30							
				92.19	92.14							

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Facility Summary **Facility ID** Culpeper Plt

Product Summary

Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used (lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used (lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid

Regular Product Usage	Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used (lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used (lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid
210-W6V-648	4,416.00	20,655.78	144.59	22,222.29	22,222.29	1.08	3,337.98	3,337.98	0.16	3,337.98	3,337.98	0.16
210-W6V-697	3,326.00	15,541.39	108.79	16,740.13	16,740.13	1.08	2,519.55	2,519.55	0.16	2,519.55	2,519.55	0.16
367-D6V-1798	837.00	147.05	1.03	945.81	945.81	6.43	0.00	0.00	0.00	0.00	0.00	0.00
367-D6V-1809	375.00	19.35	0.14	33.75	33.75	1.74	0.00	0.00	0.00	0.00	0.00	0.00
371-D6V-1385-A	654.00	169.31	1.19	3,799.28	3,799.28	22.44	16.42	16.42	9.698E-02	16.42	16.42	9.698E-02
371-D6V-1395	1,063.00	186.42	1.30	3,697.26	3,697.26	19.83	21.36	21.36	0.11	21.36	21.36	0.11
371-W6V-1185-B	528.00	476.75	3.34	1,830.58	1,830.58	3.84	50.85	50.85	0.11	50.85	50.85	0.11
373-W6V-2049	11,049.00	47,405.80	331.84	59,080.18	59,080.18	1.25	10,907.01	10,907.01	0.23	10,907.01	10,907.01	0.23
373-Y6V-1941	0.00	0.00	0.00	0.00	0.00	NA	0.00	0.00	NA	0.00	0.00	NA
480-X6-2298	5.00	0.00	0.00	34.60	34.60	NA	5.60	5.60	NA	5.60	5.60	NA
480-X6V-2355	321.00	0.00	0.00	2,181.26	2,181.26	NA	43.16	43.16	NA	43.16	43.16	NA
506-D6V-1086-A	1,407.00	185.52	1.30	7,485.18	7,485.18	40.24	175.40	1.23	0.95	0.00	0.00	0.00
506-D6V-1097-A	1,097.00	143.70	1.01	6,831.79	6,831.79	47.54	144.60	2.19	1.01	1.21	1.21	8.397E-03
506-D6V-1149	482.00	6.39	4.474E-02	3,168.26	3,168.26	495.71	6.29	4.406E-02	0.98	0.00	0.00	0.00
506-D6V-1160-A	870.00	47.99	0.34	3,692.81	3,692.81	76.96	69.51	21.65	1.45	21.31	21.31	0.44
506-D6V-1272	896.00	54.99	0.38	3,722.70	3,722.70	67.69	55.21	0.39	1.00	0.00	0.00	0.00
506-D6V-1404	187.00	19.27	0.13	958.99	958.99	49.76	32.48	13.34	1.69	13.20	13.20	0.68
506-D6V-829-C	703.00	47.97	0.34	2,021.31	2,021.31	42.13	49.43	0.35	1.03	0.00	0.00	0.00
506-D6V-835	274.00	3.98	2.788E-02	918.17	918.17	230.54	4.04	2.825E-02	1.01	0.00	0.00	0.00
506-D6V-844	583.00	0.74	5.194E-03	3,710.17	3,710.17	5,000.00	0.84	5.854E-03	1.13	0.00	0.00	0.00
50-C6-3025	113.00	586.47	4.11	390.98	390.98	0.67	390.98	390.98	0.67	390.98	390.98	0.67
50-F6V-1840	15.00	17.39	0.12	101.59	101.59	5.84	0.00	0.00	0.00	0.00	0.00	0.00
542-C6V-5456	2.00	0.17	1.186E-03	12.72	12.72	74.46	0.00	0.00	0.00	0.00	0.00	0.00
542-D6V-5211	853.00	106.71	0.75	5,373.90	5,373.90	50.36	9.37	9.37	8.776E-02	9.37	9.37	8.776E-02
542-D6V-5212	626.00	483.23	3.38	3,894.97	3,894.97	8.06	160.13	160.13	0.33	160.13	160.13	0.33
542-D6V-5299-A	719.00	1,213.38	8.49	4,252.96	4,252.96	3.51	192.45	192.45	0.16	192.45	192.45	0.16
542-D6V-5350	732.00	1,716.88	12.02	3,696.60	3,696.60	2.15	117.12	117.12	6.822E-02	117.12	117.12	6.822E-02
542-D6V-5431	359.00	150.71	1.05	2,301.41	2,301.41	15.27	44.41	42.55	0.29	42.55	42.55	0.28
542-D6V-5622	896.00	814.77	5.70	5,475.99	5,475.99	6.72	254.11	230.26	0.31	230.09	230.09	0.28
542-D6V-5815	637.00	227.60	1.59	3,988.89	3,988.89	17.53	36.15	36.15	0.16	36.15	36.15	0.16
542-D6V-5906	5.75	3.59	2.513E-02	35.82	35.82	9.98	0.63	0.63	0.18	0.63	0.63	0.18
542-D6V-5907	32.25	15.83	0.11	205.93	205.93	13.17	4.05	4.05	0.26	4.05	4.05	0.26
542-D6V-5924	49.00	12.81	8.964E-02	316.58	316.58	24.72	4.34	4.28	0.34	4.28	4.28	0.33

Finishing Emissions Daily Avg / Product Usage Summary

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	Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used (lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used (lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid
542-D6V-6197	224.00	128.58	0.90	1,359.74	1,359.74	10.57	12.29	12.29	9.556E-02	12.29	12.29	9.556E-02
542-D6V-6198	275.00	284.12	1.99	1,610.54	1,610.54	5.67	16.81	16.81	5.915E-02	16.81	16.81	5.915E-02
542-D6V-6199	215.00	193.36	1.35	1,250.14	1,250.14	6.47	0.78	0.78	4.026E-03	0.78	0.78	4.026E-03
548-B6V-3509-A	640.00	694.46	4.86	3,802.17	3,802.17	5.48	33.15	33.15	4.774E-02	33.15	33.15	4.774E-02
548-D6V-3504	360.00	62.39	0.44	2,355.95	2,355.95	37.76	3.38	3.38	5.424E-02	3.38	3.38	5.424E-02
548-D6V-3505-A	568.00	104.56	0.73	3,680.64	3,680.64	35.20	5.68	5.68	5.432E-02	5.68	5.68	5.432E-02
548-D6V-3560-A	764.00	422.05	2.95	4,805.56	4,805.56	11.39	7.64	7.64	1.810E-02	7.64	7.64	1.810E-02
548-D6V-3728	723.00	243.85	1.71	4,663.35	4,663.35	19.12	14.46	0.10	5.930E-02	3.54	3.54	1.451E-02
548-W6V-3506	355.00	46.36	0.32	2,330.50	2,330.50	50.27	3.33	3.33	7.193E-02	3.33	3.33	7.193E-02
625-B6V-396	114.00	321.61	2.25	117.45	117.45	0.37	3.64	0.51	1.132E-02	0.48	0.48	1.502E-03
625-D6V-398	127.00	361.12	2.53	132.41	132.41	0.37	4.88	8.458E-02	1.350E-02	5.307E-02	5.307E-02	1.470E-04
625-D6V-421	164.00	501.35	3.51	195.09	195.09	0.39	10.28	0.30	2.051E-02	0.23	0.23	4.580E-04
625-W6V-395	154.00	609.09	4.26	202.94	202.94	0.33	0.00	0.00	0.00	0.00	0.00	0.00
625-W6V-527	202.00	1,215.51	8.51	250.04	250.04	0.21	4.906E-02	4.906E-02	4.036E-05	4.906E-02	4.906E-02	4.036E-05
644-C6-6	115.00	4.79	3.353E-02	1.15	1.15	0.24	0.00	0.00	0.00	0.00	0.00	0.00
830-40L6V-2498	13,479.00	37,864.56	265.05	67,312.78	67,312.78	1.78	14,165.53	14,165.53	0.37	14,165.53	14,165.53	0.37
830-40L6V-2908	1,295.00	4,107.79	28.75	6,160.70	6,160.70	1.50	1,540.45	1,540.45	0.38	1,540.45	1,540.45	0.38
830-PJ6-2479	840.00	4,901.10	34.31	2,709.34	2,709.34	0.55	1,407.92	1,407.92	0.29	1,407.92	1,407.92	0.29
830-PJ6V-2766	360.00	1,349.80	9.45	1,516.45	1,516.45	1.12	0.00	0.00	0.00	0.00	0.00	0.00
831-35L6V-573	3,142.00	7,933.92	55.54	16,172.19	16,172.19	2.04	2,616.34	2,616.34	0.33	2,616.34	2,616.34	0.33
920-W6V-1526	369.00	245.60	1.72	2,288.00	2,288.00	9.32	108.61	108.61	0.44	108.61	108.61	0.44
Acetone	754.00	0.00	0.00	0.00	0.00	NA	0.00	0.00	NA	0.00	0.00	NA
BC-05	628.00	1,662.54	11.64	872.92	872.92	0.53	3.99	3.99	2.402E-03	3.99	3.99	2.402E-03

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	Total Amount (gal)	Total Solids Used(lb)	Total Solids Emitted(lb)	Total VOC Used (lb)	Total VOC Emitted(lb)	lb VOC / lb Solid	Total HAP Used (lb)	Total HAP Emitted(lb)	lb HAP / lb Solid	Total VHAP Used(lb)	Total VHAP Emitted(lb)	lb VHAP / lb Solid
Mineral Spirit 66/3	528.00	0.00	0.00	3,400.32	3,400.32	NA	0.00	0.00	NA	0.00	0.00	NA
SB-129	2,262.00	0.00	0.00	15,964.78	15,964.78	NA	15,964.79	15,964.79	NA	15,964.79	15,964.79	NA
WO-12	1,374.00	0.00	0.00	7,638.77	7,638.77	NA	0.00	0.00	NA	0.00	0.00	NA
Total Regular Usage	64,123.00	153,720.29	1,076.04	323,896.77	323,896.77	2.11	54,577.46	54,020.83	0.36	54,020.48	54,020.48	0.35
Daily Average	251.46	602.82	4.22	1,270.18	1,270.18		214.03	211.85		211.85	211.85	
Facility Grand Total	**64,123.00**	**153,720.29**	**1,076.04**	**323,896.77**	**323,896.77**	**2.11**	**54,577.46**	**54,020.83**	**0.36**	**54,020.48**	**54,020.48**	**0.35**
Daily Average	251.46	602.82	4.22	1,270.18	1,270.18		214.03	211.85		211.85	211.85	
Total VOC-Exempt Chemicals				23,507.90	23,496.30							
Daily Average				92.19	92.14							

The highlighted fields represent inconsistencies in product data.

Facility Component Summary

CAS #	Chemical Name	Used (lb)	Daily Avg Use (lb)	Emissions Fugitive (lb)	Daily Avg Emissions (lb)	VOC	HAPS	VHAPS	SARA313	SARA312
Specific Chemicals										
0000050-00-0	FORMALDEHYDE	86.17	0.34	86.17	0.34	☑	☑	☑	☑	☑
0000057-55-6	PROPYLENE GLYCOL	847.80	3.32	847.80	3.32	☑	☐	☐	☐	☑
0000064-02-8	EDTA TETRASODIUM SALT	16.30	6.392E-02	0.11	4.314E-04	☐	☐	☐	☐	☑
0000064-17-5	ETHYL ALCOHOL	51,604.93	202.37	51,604.93	202.37	☑	☐	☐	☐	☑
0000067-56-1	METHANOL[*]	4,087.97	16.03	4,087.97	16.03	☑	☑	☑	☑	☑
0000067-63-0	ISOPROPYL ALCOHOL[*]	14,841.97	58.20	14,841.97	58.20	☑	☐	☐	☑	☑
0000071-23-8	PROPYL ALCOHOL	171.20	0.67	171.20	0.67	☑	☐	☐	☐	☑
0000071-36-3	N-BUTYL ALCOHOL	4,226.18	16.57	4,226.18	16.57	☑	☐	☐	☑	☑
0000072-48-0	ANTHRAQUINONE BASED PIGMENT	312.31	1.22	2.19	8.588E-03	☐	☐	☐	☐	☑
0000078-83-1	ISOBUTYL ALCOHOL	24,671.33	96.75	24,671.33	96.75	☑	☐	☐	☐	☑
0000078-93-3	METHYL ETHYL KETONE	10,267.84	40.27	10,267.84	40.27	☑	☐	☐	☐	☑
0000091-20-3	NAPHTHALENE	1.75	6.863E-03	1.75	6.863E-03	☑	☑	☑	☑	☑
0000095-63-6	1,2,4-TRIMETHYLBENZENE	5,902.77	23.15	5,902.77	23.15	☑	☐	☐	☑	☑
0000096-29-7	2-BUTANONE OXIME	11.98	4.698E-02	11.98	4.698E-02	☑	☐	☐	☐	☑
0000098-82-8	CUMENE	276.68	1.09	276.68	1.09	☑	☑	☑	☑	☑
0000100-41-4	ETHYLBENZENE[*]	5,295.41	20.77	5,295.41	20.77	☑	☑	☑	☑	☑
0000100-42-5	STYRENE	6.93	2.718E-02	6.93	2.718E-02	☑	☑	☑	☑	☑
0000104-15-4	P-TOLUENESULFONIC ACID	4,178.11	16.38	29.25	0.11	☐	☐	☐	☐	☑
0000107-66-4	DIBUTYL PHOSPHATE	1,349.87	5.29	9.45	3.706E-02	☐	☐	☐	☐	☑
0000107-87-9	METHYL PROPYL KETONE	32,670.94	128.12	32,670.94	128.12	☑	☐	☐	☐	☑
0000107-98-2	PROPYLENE GLYCOL MONOMETHYL ETHER	600.25	2.35	600.25	2.35	☑	☐	☐	☐	☑
0000108-10-1	METHYL ISOBUTYL KETONE	2,162.62	8.48	2,162.62	8.48	☑	☑	☑	☑	☑
0000108-21-4	ISOPROPYL ACETATE	913.04	3.58	913.04	3.58	☑	☐	☐	☐	☑

0000108-65-6	PROPYLENE GLYCOL MONOMETHYL ETHER ACETATE	3,368.09	13.21	3,368.09	13.21	☒	☐	☐	☐	☒
0000108-83-8	DIISOBUTYL KETONE	911.89	3.58	911.89	3.58	☒	☐	☐	☐	☒
0000108-88-3	TOLUENE	16,363.51	64.17	16,363.51	64.17	☒	☒	☒	☒	☒
0000109-60-4	N-PROPYL ACETATE[*]	4,989.23	19.57	4,989.23	19.57	☒	☐	☐	☐	☒
0000110-12-3	METHYL ISOAMYL KETONE	434.59	1.70	434.59	1.70	☒	☐	☐	☐	☒
0000110-19-0	ISO-BUTYL ACETATE	5,511.92	21.62	5,511.92	21.62	☒	☐	☐	☐	☒
0000110-43-0	METHYL N-AMYL KETONE	8,571.09	33.61	8,571.09	33.61	☒	☐	☐	☐	☒
0000111-42-2	DIETHANOLAMINE	0.81	3.176E-03	0.81	3.176E-03	☒	☒	☒	☒	☒
0000111-46-6	DIETHYLENE GLYCOL	36.57	0.14	36.57	0.14	☒	☐	☐	☐	☒
0000111-66-0	1-OCTENE	0.53	2.078E-03	0.53	2.078E-03	☒	☐	☐	☐	☒
0000111-76-2	ETHYLENE GLYCOL MONOBUTYL ETHER	804.86	3.16	804.86	3.16	☒	☐	☐	☒	☒
0000112-02-7	HEXADECYLTRIMETHYLAMMONIUM CL	5.817E-03	2.281E-05	4.072E-05	1.597E-07	☐	☐	☐	☐	☒
0000123-19-3	4-HEPTANONE	4,175.81	16.38	4,175.81	16.38	☒	☐	☐	☐	☒
0000123-86-4	BUTYL ACETATE	38,615.00	151.43	38,615.00	151.43	☒	☐	☐	☐	☒
0000124-68-5	2-AMINO-2-METHYL-1-PROPANOL	0.33	1.294E-03	0.33	1.294E-03	☒	☐	☐	☐	☒
0000132-27-4	SODIUM O-PHENYLPHENOXIDE	6.679E-03	2.619E-05	4.676E-05	1.833E-07	☐	☐	☐	☒	☒
0000139-13-9	NITRILOTRIACETIC ACID	0.41	1.608E-03	0.41	1.608E-03	☒	☐	☐	☒	☒
0000147-14-8	PHTHALOCYANINE BLUE	0.37	1.451E-03	2.595E-03	1.018E-05	☐	☐	☐	☒	☒
0000540-88-5	TERT-BUTYL ACETATE	1,064.94	4.18	1,064.94	4.18	☒	☐	☐	☐	☒
0000541-85-5	5-METHYL-3-HEPTANONE	1,340.63	5.26	1,340.63	5.26	☒	☐	☐	☐	☒
0000546-93-0	MAGNESIUM CARBONATE[*]	24.91	9.769E-02	0.17	6.667E-04	☐	☐	☐	☐	☒
0000701-64-4	MONOPHENYL PHOSPHORIC ACID	684.94	2.69	4.79	1.878E-02	☐	☐	☐	☐	☒
0001047-16-1	QUINACRIDONEPIGMENT	51.43	0.20	0.36	1.412E-03	☐	☐	☐	☐	☒
0001103-39-5	ACID AZO CALCIUM SALT[*]	0.38	1.490E-03	2.682E-03	1.052E-05	☐	☐	☐	☐	☒
0001309-37-1	FERRIC OXIDE	757.99	2.97	5.31	2.082E-02	☐	☐	☐	☐	☒
0001310-73-2	SODIUM HYDROXIDE	0.81	3.176E-03	5.704E-03	2.237E-05	☐	☐	☐	☐	☒
0001313-13-9	MANGANESE DIOXIDE	15.90	6.235E-02	0.11	4.314E-04	☐	☒	☐	☒	☒
0001317-34-6	MANGANESE TRIOXIDE	37.39	0.15	0.26	1.020E-03	☐	☒	☐	☒	☒
0001317-65-3	CALCIUM CARBONATE	3.832E-03	1.503E-05	2.682E-05	1.052E-07	☐	☐	☐	☐	☒
0001318-59-8	CHLORITE	230.56	0.90	1.61	6.314E-03	☐	☐	☐	☐	☒
0001330-20-7	XYLENE[*]	22,681.45	88.95	22,681.45	88.95	☒	☒	☒	☒	☒
0001332-37-2	YELLOW IRON OXIDE	148.03	0.58	1.04	4.078E-03	☐	☐	☐	☐	☒
0001332-58-7	KAOLIN	957.40	3.75	6.70	2.627E-02	☐	☐	☐	☐	☒
0001333-86-4	CARBON BLACK	215.65	0.85	1.51	5.922E-03	☐	☐	☐	☐	☒
0001344-28-1	ALUMINUM OXIDE	15.90	6.235E-02	0.11	4.314E-04	☐	☐	☐	☒	☒
0001589-47-5	2-METHOXY-1-PROPANOL	1.75	6.863E-03	1.75	6.863E-03	☒	☐	☐	☐	☒
0001623-15-0	MONOBUTYL PHOSPHORIC ACID	1,349.87	5.29	9.45	3.706E-02	☐	☐	☐	☐	☒
0002786-76-7	NAPHTHANIL RED	44.40	0.17	0.31	1.216E-03	☐	☐	☐	☐	☒
0005102-83-0	DIAZO PIGMENT	1.23	4.824E-03	8.580E-03	3.365E-05	☐	☐	☐	☐	☒
0006358-85-6	DIARYANILIDE YELLOW[*]	26.97	0.11	0.19	7.451E-04	☐	☐	☐	☐	☒
0006471-49-4	NITRO ANISIDINE/ANILIDE BON A	0.65	2.549E-03	4.667E-03	1.791E-05	☐	☐	☐	☐	☒

0007440-44-0	CARBON	76.19	0.30	0.53	2.078E-03	☐	☐	☐	☐	☒
0007631-86-9	SILICA, AMORPHOUS	2,940.46	11.53	20.58	8.071E-02	☐	☐	☐	☐	☒
0007664-41-7	AMMONIA	39.59	0.16	39.59	0.16	☐	☐	☐	☒	☒
0007664-93-9	SULFURIC ACID	38.05	0.15	0.27	1.059E-03	☐	☐	☐	☒	☒
0007727-43-7	BARIUM SULFATE	39.18	0.15	0.27	1.059E-03	☐	☐	☐	☐	☒
0007732-18-5	WATER	6,639.34	26.04	6,639.34	26.04	☐	☐	☐	☐	☐
0007757-82-6	SODIUM SULFATE	9.95	3.902E-02	6.968E-02	2.733E-04	☐	☐	☐	☐	☒
0007758-87-4	TRICALCIUM PHOSPHATE	658.69	2.58	4.61	1.808E-02	☐	☐	☐	☐	☒
0008001-79-4	CASTOR OIL	35.73	0.14	0.25	9.804E-04	☐	☐	☐	☐	☒
0008002-43-5	SOYBEAN LECITHIN	2.761E-02	1.083E-04	1.932E-04	7.576E-07	☐	☐	☐	☐	☒
0008030-76-0	SOYBEAN LECITHIN (UNBLEACHED)	53.19	0.21	0.37	1.451E-03	☐	☐	☐	☐	☒
0008032-32-4	NAPHTHA, VM&P	11.53	4.522E-02	11.53	4.522E-02	☒	☐	☐	☐	☒
0008050-09-7	ROSIN	5.95	2.333E-02	4.162E-02	1.632E-04	☐	☐	☐	☐	☒
0008052-41-3	STODDARD SOLVENT[*]	7,272.07	28.52	7,272.07	28.52	☒	☐	☐	☐	☒
0008002-88-4	POLYETHYLENE	9.95	3.902E-02	6.968E-02	2.733E-04	☐	☐	☐	☐	☒
0009004-36-8	CELLULOSE ACETATE BUTYRATE	5,727.84	22.46	40.09	0.16	☐	☐	☐	☐	☒
0009007-13-0	CALCIUM RESINATE	9.053E-02	3.550E-04	6.337E-04	2.485E-06	☐	☐	☐	☐	☒
0009016-45-9	POLYETHYLENE MONO(NONYLPHENYL GLYCOL ETHER(NO	1.17	4.588E-03	8.198E-03	3.215E-05	☐	☐	☐	☐	☒
0009036-19-5	T-DET C08	0.84	3.294E-03	5.868E-03	2.301E-05	☐	☐	☐	☐	☒
0012002-43-6	GILSONITE	8.18	3.208E-02	5.729E-02	2.247E-04	☐	☐	☐	☐	☒
0013463-67-7	TITANIUM DIOXIDE	42,424.26	166.37	296.97	1.16	☐	☐	☐	☐	☒
0014807-96-6	TALC	9,345.11	36.65	65.42	0.26	☐	☐	☐	☐	☒
0014808-60-7	SILICA, CRYSTALLINE[*]	602.57	2.36	4.22	1.655E-02	☐	☐	☐	☐	☒
0016389-88-1	Dolomite (CaMg(CO3)2)	89.27	0.35	0.62	2.431E-03	☐	☐	☐	☐	☒
0020344-49-4	Iron oxide	10.94	4.290E-02	7.661E-02	3.004E-04	☐	☐	☐	☐	☒
0021645-51-2	ALUMINUM HYDROXIDE	1,014.55	3.98	7.10	2.784E-02	☐	☐	☐	☐	☒
0025119-62-4	STYRENE/ALLYL ALCOHOL RESIN	1,500.28	5.88	10.50	4.118E-02	☐	☐	☐	☐	☒
0025212-88-8	METHACRYLIC ACID, POLYMER W/ ETHYL ACRYLATE	65.88	0.26	0.46	1.804E-03	☐	☐	☐	☐	☒
0025322-68-3	POLYETHYLENE GYLCOL	8.495E-02	3.331E-04	5.947E-04	2.332E-06	☐	☐	☐	☐	☒
0025322-69-4	POLYOXYPROPYLENE GLYCOL	35.78	0.14	0.25	9.804E-04	☐	☐	☐	☐	☒
0025973-55-1	BENZOTRIAZOLE	457.95	1.80	3.21	1.259E-02	☐	☐	☐	☐	☒
0027323-41-7	TRIETHANOLAMINE DODECYLBENZENE SULFONATE	0.36	1.412E-03	2.527E-03	9.910E-06	☐	☐	☐	☐	☒
0031837-42-0	PIGMENT YELLOW 151	0.19	7.451E-04	1.320E-03	5.178E-06	☐	☐	☐	☐	☒
0034590-94-8	DIPROPYLENE GLYCOL MONOMETHYL ETHER	28.33	0.11	28.33	0.11	☒	☐	☐	☐	☒
0051200-87-4	DIMETHYLOXAZOLIDINE	13.57	5.322E-02	9.501E-02	3.726E-04	☐	☐	☐	☐	☒
0051274-00-1	YELLOW IRON OXIDE	51.54	0.20	0.36	1.412E-03	☐	☐	☐	☐	☒
0053710-52-4	2-Propenoic acid, 2-hydroxypropyl ester, polymer with chloroethene	232.03	0.91	1.62	6.353E-03	☐	☐	☐	☐	☒
0053980-88-4	C21 DICARBOXYLIC FATTY ACID	322.24	1.26	322.24	1.26	☒	☐	☐	☐	☒

0060864-33-7	ALKYL ARYL POLYETHER	4.74	1.859E-02	3.319E-02	1.302E-04	☐	☐	☐	☐	☒
0061790-12-3	TALL OIL	2.761E-02	1.083E-04	1.932E-04	7.576E-07	☐	☐	☐	☐	☒
0061791-12-6	CREMOPHOR EL	11.72	4.596E-02	11.72	4.596E-02	☒	☐	☐	☐	☒
0063231-60-7	microcrystalline waxes	37.41	0.15	0.26	1.020E-03	☐	☐	☐	☐	☒
0064742-42-3	CLAY TREATED MICROCRYSTALLINE WAX	232.61	0.91	1.63	6.392E-03	☐	☐	☐	☐	☒
0064742-47-8	ISOPARAFFINIC PETROLEUM DISTILLATE[*]	282.06	1.11	282.06	1.11	☒	☐	☐	☐	☒
0064742-48-9	NAPHTHA, HEAVY HYDROTREATED (PETROLEUM)	3.87	1.518E-02	3.87	1.518E-02	☒	☐	☐	☐	☒
0064742-49-0	VM & P NAPHTHA	9,111.10	35.73	9,111.10	35.73	☒	☐	☐	☐	☒
0064742-88-7	MEDIUM MINERAL SPIRITS[*]	17,805.53	69.83	17,805.53	69.83	☒	☐	☐	☐	☒
0064742-89-8	ALIPHATIC, LIGHT HYDROCARBON SOLVENT[*]	6,632.30	26.01	6,632.30	26.01	☒	☐	☐	☐	☒
0065997-06-0	ROSIN, PARTIALLY HYDROGENATED	4.235E-02	1.661E-04	2.965E-04	1.163E-06	☐	☐	☐	☐	☒
0068002-18-6	ISOBUTYLATE U/F RESIN	6,834.42	26.80	47.84	0.19	☐	☐	☐	☐	☒
0068002-19-7	BUTYLATED U/F RESIN	3,470.64	13.61	24.29	9.525E-02	☐	☐	☐	☐	☒
0068038-31-3	ROSIN MOD. TALL OIL FA ALKYD	2.07	8.118E-03	1.449E-02	5.682E-05	☐	☐	☐	☐	☒
0068186-34-5	MODIFIED ALKYLPHOSPHATE ESTER	5.42	2.125E-02	3.794E-02	1.488E-04	☐	☐	☐	☐	☒
0068475-37-6	GLYCERIN ESTER/POLYMER ROSIN	116.94	0.46	0.82	3.216E-03	☐	☐	☐	☐	☒
0068515-48-0	PHTHALATE ESTERS	97.40	0.38	0.68	2.667E-03	☐	☐	☐	☐	☒
0068953-58-2	QUARTERNARY AMMONIUM CPDS, BIS (HYDROGENATED TALLOW ALKYL) DIMETHYL-SALT	639.44	2.51	4.48	1.757E-02	☐	☐	☐	☐	☒
0070131-67-8	METHYL SILOXANE LINEAR/CYCLIC	3.73	1.463E-02	3.73	1.463E-02	☒	☐	☐	☐	☒
0070657-70-4	2-METHOXY-1-PROPANOL ACETATE	8.79	3.447E-02	8.79	3.447E-02	☒	☐	☐	☐	☒
0071566-54-6	PIGMENT	0.93	3.647E-03	6.489E-03	2.545E-05	☐	☐	☐	☐	☒
0075673-43-7	075673-43-7 - Please call ERA Environmental Consulting for details concerning this chemical	0.33	1.294E-03	2.306E-03	9.043E-06	☐	☐	☐	☐	☒
0085099-25-8	MOD AMMONIUM DI.H PHOSPHATE	234.23	0.92	1.64	6.431E-03	☐	☐	☐	☐	☒
0085711-34-8	MOD AMIDES, TALL-OIL PHOSPHATE	95.13	0.37	0.67	2.627E-03	☐	☐	☐	☐	☒
0085828-89-3	CHROME (III) AZO DYE	324.43	1.27	2.27	8.902E-03	☐	☒	☐	☒	☒
0112926-00-8	SILICA - PRECIPITATED	489.12	1.92	3.42	1.341E-02	☐	☐	☐	☐	☒
0114653-42-8	VINYL CHLORIDE COPOLYMER	9,283.36	36.41	64.98	0.25	☐	☐	☐	☐	☒
UNKNOWN	ACRYLIC RESIN	2,977.03	11.67	20.84	8.173E-02	☐	☐	☐	☐	☒
UNKNOWN	ALIPHATIC HYDROCARBON	281.58	1.10	281.58	1.10	☒	☐	☐	☐	☒
UNKNOWN	ALKYD	10,256.03	40.22	71.79	0.28	☐	☐	☐	☐	☒
UNKNOWN	ALKYD RESIN	821.10	3.22	5.75	2.255E-02	☐	☐	☐	☐	☒
UNKNOWN	AROMATIC SOLVENT	11,728.32	45.99	11,728.32	45.99	☒	☐	☐	☐	☒
UNKNOWN	AZO PIGMENT	1.62	6.353E-03	1.132E-02	4.439E-05	☐	☐	☐	☐	☒
UNKNOWN	CHROMIUM III COMPLEX DYE	153.98	0.60	1.08	4.235E-03	☐	☒	☐	☒	☒
UNKNOWN	CHROMIUM III COMPOUND	22.39	8.780E-02	0.16	6.275E-04	☐	☒	☐	☒	☒
UNKNOWN	CLAY	166.84	0.65	1.17	4.588E-03	☐	☐	☐	☐	☒

UNKNOWN	COCONUT ALKYD	25,273.11	99.11	176.91	0.69	☐	☐	☐	☐	☒
UNKNOWN	DIARYLIDE PIGMENT	47.61	0.19	0.33	1.294E-03	☐	☐	☐	☐	☒
UNKNOWN	EPOXY	0.22	8.627E-04	1.545E-03	6.059E-06	☐	☐	☐	☐	☒
UNKNOWN	FATTY ACID	42.00	0.16	0.29	1.137E-03	☐	☐	☐	☐	☒
UNKNOWN	FATTY ACID AMIDE	66.46	0.26	0.47	1.843E-03	☐	☐	☐	☐	☒
UNKNOWN	FLUROALIPHATIC POLYMERIC ESTER	0.18	7.059E-04	1.226E-03	4.808E-06	☐	☐	☐	☐	☒
UNKNOWN	HYDROCARBON OIL	2.30	9.020E-03	1.611E-02	6.318E-05	☐	☐	☐	☐	☐
UNKNOWN	MELAMINE-FORMALDEHYDE RESIN	12,721.56	49.89	89.05	0.35	☐	☐	☐	☐	☒
UNKNOWN	NONHAZARDOUS INGREDIENT	17.34	6.800E-02	0.12	4.706E-04	☐	☐	☐	☐	☒
UNKNOWN	NON-HAZARDOUS SOLID	2.44	9.569E-03	1.708E-02	6.698E-05	☐	☐	☐	☐	☐
UNKNOWN	ORGANIC	347.65	1.36	2.43	9.529E-03	☐	☐	☐	☐	☒
UNKNOWN	PIGMENT	7.96	3.122E-02	5.572E-02	2.185E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYAMINE AMIDE SALT	15.02	5.890E-02	0.11	4.314E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYAMINOAMIDE SALT	0.20	7.843E-04	1.373E-03	5.384E-06	☐	☐	☐	☐	☒
UNKNOWN	POLYCARBOXYLIC ACID NA SALT	16.51	6.475E-02	0.12	4.706E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYESTER BASED BLOCK COPOLYMER	29.89	0.12	0.21	8.235E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYSILOXANE	30.06	0.12	0.21	8.235E-04	☐	☐	☐	☐	☒
UNKNOWN	POLYURETHANE	1.15	4.510E-03	8.053E-03	3.158E-05	☐	☐	☐	☐	☐
UNKNOWN	RESIN	170.72	0.67	1.20	4.706E-03	☐	☐	☐	☐	☒
UNKNOWN	SOYA ALKYD	1,825.94	7.16	12.78	5.012E-02	☐	☐	☐	☐	☒
UNKNOWN	SURFACTANTS	272.48	1.07	1.91	7.490E-03	☐	☐	☐	☐	☒
UNKNOWN	TALL OIL FA ALKYD	17.96	7.043E-02	0.13	5.098E-04	☐	☐	☐	☐	☒
UNKNOWN	VINYL POLYMER	16.52	6.476E-02	0.12	4.706E-04	☐	☐	☐	☐	☒
	Specific Chemicals TOTALS	**480,767.36**	**1,885.36**	**328,774.69**	**1,289.31**					
VOC Exempt										
0000067-64-1	ACETONE[*]	23,496.22	92.14	23,496.22	92.14	☐	☐	☐	☐	☒
0000556-67-2	OCTAMETHYLCYCLOTETRASILO	0.36	1.412E-03	2.527E-03	9.910E-06	☐	☐	☐	☐	☒
0063148-62-9	SILICONE	11.32	4.439E-02	7.927E-02	3.109E-04	☐	☐	☐	☐	☒
	VOC Exempt TOTALS	**23,507.90**	**92.19**	**23,496.30**	**92.14**					
Summary Chemicals and Criteria Chemicals										
Code N* values represent sum totals of individually reported chemicals in the Toxic Category Code**										
N001	IRON COMPOUNDS	968.50	3.80	6.78	2.659E-02	☐	☐	☐	☐	☒
N090	CHROMIUM COMPOUNDS	500.80	1.96	3.51	1.376E-02	☐	☒	☐	☒	☒
N099	CHROMIUM COMPOUNDS (All)	324.43	1.27	2.27	8.902E-03	☐	☐	☐	☐	☒
N100	COPPER COMPOUNDS	0.37	1.451E-03	2.595E-03	1.018E-05	☐	☐	☐	☒	☒
N101	Copper Compounds_All	0.37	1.451E-03	2.595E-03	1.018E-05	☐	☐	☐	☐	☒
N229	Glycol Ethers, All	804.86	3.16	804.86	3.16	☐	☐	☐	☐	☒
N230	GLYCOL ETHER	804.86	3.16	804.86	3.16	☐	☒	☐	☒	☒
N333	N333_Test Toxic Category_DoNotUse	6.93	2.718E-02	6.93	2.718E-02	☐	☐	☐	☐	☒
N450	MANGANESE COMPOUNDS	53.28	0.21	0.37	1.451E-03	☐	☒	☐	☒	☒
N451	Manganese Compounds_All	53.28	0.21	0.37	1.451E-03	☐	☐	☐	☐	☒

N589	Polycyclic Organic Matter for Formulation Assessment Plan	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N591	(POMTV) Polycyclic Organic Matter (Specific Compounds from OAQPS for TV)	1.75	6.863E-03	1.75	6.863E-03	☐	☒	☐	☐	☒
N593	(16PAH) POLYCYCLIC AROMATIC HYDROCARBONS	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N594	(PAH) POLYCYCLIC AROMATIC HYDROCARBONS	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N810	PHOSPHORUS COMPOUNDS	4,378.17	17.17	30.65	0.12	☐	☐	☐	☐	☒
N620	NONYLPHENOL, ITS ETHOXYLATES AND DERIVATIVES	1.17	4.588E-03	8.198E-03	3.215E-05	☐	☐	☐	☐	☒
N630	OCTYLPHENOL AND ITS ETHOXYLATES	0.84	3.294E-03	5.868E-03	2.301E-05	☐	☐	☐	☐	☒
N642	Siloxanes (Completely Methylated)	11.69	4.584E-02	8.180E-02	3.208E-04	☐	☐	☐	☐	☒
N655	CHROMIUM (III) COMPOUNDS	324.43	1.27	2.27	8.902E-03	☐	☒	☐	☒	☒
N663	ALUMINUM COMPOUNDS	1,987.85	7.80	13.91	5.455E-02	☐	☐	☐	☐	☒
N670	AMMONIUM COMPOUNDS	873.67	3.43	6.12	2.400E-02	☐	☐	☐	☐	☒
N695	TRIMETHYLBENZENE ISOMERS	5,902.77	23.15	5,902.77	23.15	☐	☐	☐	☐	☒
N696	XYLENE ISOMERS	22,681.45	88.95	22,681.45	88.95	☐	☒	☐	☒	☒
N698	MINERAL SPIRITS GROUP 1	31,725.30	124.41	31,725.30	124.41	☐	☐	☐	☐	☒
N699	MINERAL SPIRITS GROUP 2	282.06	1.11	282.06	1.11	☐	☐	☐	☐	☒
N705	AMMONIA AND AMMONIUM ION COMPOUNDS	679.03	2.66	44.06	0.17	☐	☐	☐	☐	☒
N706	PHOSPHORUS TOTAL WITHOUT 7723-14-0	4,378.17	17.17	30.65	0.12	☐	☐	☐	☐	☒
N734	Nonylphenol and its ethoxylates	1.17	4.588E-03	8.198E-03	3.215E-05	☐	☐	☐	☐	☒
N800	MINERAL SPIRITS	32,007.36	125.52	32,007.36	125.52	☐	☐	☐	☐	☒
N831	MANGANESE COMPOUNDS (Inorganic)	53.28	0.21	0.37	1.451E-03	☐	☒	☐	☒	☒
N833	Xylene isomers (except p-)	22,681.45	88.95	22,681.45	88.95	☐	☒	☐	☒	☒
N866	CHLORIDE COMPOUNDS	639.45	2.51	4.48	1.757E-02	☐	☐	☐	☐	☒
N880	PETROLEUM	16,029.33	62.86	16,029.33	62.86	☐	☐	☐	☐	☐
N903	Ethyl-/ Methyl-Glycols and their Acetates	1.75	6.863E-03	1.75	6.863E-03	☐	☐	☐	☐	☒
N915	Phthalate Compounds	97.40	0.38	0.68	2.667E-03	☐	☐	☐	☐	☒
N999	N999 - test and	145.23	0.57	16.35	6.412E-02	☐	☒	☐	☐	☒
NA-ERAEnviro	HAPS	54,577.48	214.03	54,020.83	211.85	☐	☒	☐	☐	☒
NA-ERAEnviro	PM (TOTAL)	153,720.29	602.82	1,076.04	4.22	☐	☐	☐	☐	☒
NA-ERAEnviro	PM-10 (TOTAL)	153,720.29	602.82	1,076.04	4.22	☐	☐	☐	☐	☒
NA-ERAEnviro	PM-2.5 (TOTAL)	153,720.29	602.82	1,076.04	4.22	☐	☐	☐	☐	☒
NA-ERAEnviro	SARA312	497,630.03	1,951.49	345,631.62	1,355.42	☐	☐	☐	☐	☒
NA-ERAEnviro	SARA313	77,387.47	303.48	76,783.32	301.11	☐	☐	☐	☐	☒
NA-ERAEnviro	VHAPS	54,020.48	211.85	54,020.48	211.85	☐	☐	☐	☐	☒
NA-ERAEnviro	VOC	323,896.77	1,270.18	323,896.77	1,270.18	☒	☐	☐	☐	☒

NA-ERAEnviro VOC-UNCLASSIFIED	2,872.44	11.26	2,872.44	11.26	☑	☐	☐	☐	☑

VOC Exempt and Specific Chemicals TOTALS	**504,275.26**	**1,977.55**	**352,270.99**	**1,381.45**

Legend Chemical State

[*] Multiple chemical names replaced with default name

Attachment B

NRO-078-14

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193-1453
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

May 28, 2014

Mr. Nathan Martineau
Director of Manufacturing
Masco Cabinetry, LLC.
P.O. Box 1387
Culpeper, Virginia 22701

Location: Culpeper County
Registration No.: 40728
County-Plant No.: 047-00032

Dear Mr. Martineau:

Attached is a minor amendment to your new source review permit dated March 7, 2005 to modify and operate a wood cabinet manufacturing and finishing facility in accordance with the provisions of the Virginia Regulations for the Control and Abatement of Air Pollution. The purpose of this amendment is to acknowledge the permanent shutdown of the Caterpillar 3412 diesel engine generator at your facility and update other conditions previously met, and implementing changes to reflect the current federal standards for Wood Furniture Manufacturing Operations in 40 CFR 63 (MACT), Subpart JJ. Permit changes are reflected in the removal of previous Section II (Generator) of the permit issued March 7, 2005, and revisions to other conditions in previous Sections IV (Compliance Test), V (Notifications) and VI (MACT). This amended permit document supersedes your permit document dated March 7, 2005.

The Department of Environmental Quality (DEQ) deemed the application complete on April 10, 2014, and has determined that the application meets the requirements of 9 VAC 5-80-1280 for a minor amendment to a new source review permit.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to modify and operate shall not relieve Masco Cabinetry, LLC. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code (VAC) 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within thirty days after this case decision notice was mailed or

delivered to you. 9 VAC 5-170-200 also provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Mr. Alireza Khalilzadeh at 703.583.3839.

Sincerely,

James B. LaFratta
Regional Air Permit Manager

TAF/JBL/AK/14078mnsr.doc

Attachment: Permit

cc: Regional Air Compliance Manager (electronic file submission)
File

NRO-078-14

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193-1453
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

This amended permit document supersedes your permit document dated March 7, 2005.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Masco Cabinetry, LLC.
Merillat Culpeper Plant
P.O. Box 1387
Culpeper, Virginia 22701

Registration No.: 40728
County-Plant No.: 047-00032

is authorized to modify and operate

a Wood Cabinet Manufacturing and Finishing Facility

located at

641 Maddox Drive
Culpeper, Virginia 22701

in accordance with the Conditions of this permit.

Approved on: March 7, 2005
Amended on: May 28, 2014

Thomas A. Faha
Regional Director

Permit consists of 18 pages.
Permit Conditions 1 to 38.

INTRODUCTION

This permit approval is based on the permit amendment application dated February 25, 2014; additional amendment requested by letter dated April 9, 2014; and earlier permit applications dated October 18, 2004; September 13, 2000; and May 1, 1998; including amendment information dated March 22, 1999. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-80-850 (definitions) and 9 VAC 5-10-20 of the State Air Pollution Control Board's (Board) Regulations for the Control and Abatement of Air Pollution (Regulations). The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the Department of Environmental Quality (DEQ) or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List –**

   Permitted equipment constructed and operating at this facility consists of:

   - Woodworking and machining operation including saws, borers, routers, sanding equipment, and shaping & carving machines, including associated baghouses (designed for a minimum 99% collection efficiency) and dust collection systems rated at 90,000 cfm.

   - Natural Gas Fired Curing Ovens with a combined capacity of 5.0 MMBtu/hr.

   - Natural Gas Fired Air Make-Up Units with a combined capacity of 19.0 MMBtu/hr.

   - Natural Gas Fired Space Heaters & Boilers with a combined capacity of 16.0 MMBtu/hr.

   - Up to fourteen coating booths with associated production conveyor systems and two off-line coating booths, each rated at 193 cabinets per hour based on cabinet production. Each booth includes a manually operated HVLP or equivalent spray gun.

- One manual and/or automated wood brushing system rated at 193 cabinets per hour based on cabinet production.

- One manual or automated sanding system rated at 193 cabinets per hour based on cabinet production.

- One paint spray booth.

- One particle board sawing operation rated at 4700 linear feet per hour.

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
(9 VAC 5-80-1180 D 3)

WOODWORKING CONDITIONS

2. **Emission Controls** - Particulate emissions from the particle saw board operation shall be controlled by exhausting the saw to the inside of the manufacturing facility.
(9 VAC 5-50-260)

3. **Fugitive Dust/Emission Controls** - Fugitive particulate emissions from the collection, transfer and handling of wood waste shall be controlled by covering of all conveyors and/or complete enclosure.
(9 VAC 5-50-260)

4. **Emission Controls** - Particulate emissions from the woodworking and machining operation shall be controlled by baghouses. The baghouses shall be provided with adequate access for inspection and shall be in operation when woodworking and machining processes are operating.
(9 VAC 5-50-260)

5. **Monitoring Devices** - Each baghouse shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the respective baghouse is operating.
(9 VAC 5-80-1180D, 9 VAC 5-50-20 C, and 9 VAC 5-50-260)

6. **Monitoring Device Observation** - The control monitoring device used to continuously measure differential pressure drop across the fabric filter shall be observed by the permittee with a frequency of not less than once per day. The permittee shall keep a log of the observations from the control monitoring device.
(9 VAC 5-80-1180D)

7. **Emission Limits** - Particulate emissions from combined operation of all woodworking and machining baghouse dust collection systems shall not exceed the limits specified below:

PM-10	0.01 grains/dscf	2.0 tons/yr

Compliance with these emission limits may be determined as stated in Condition 10.
(9 VAC 5-50-260 and 9 VAC 5-80-1180)

8. **Visible Emission Limit** - Visible emissions from the exhaust of each woodworking and machining baghouse dust collection system shall not exceed five percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80, 9 VAC 5-50-260, and 9 VAC 5-80-1180)

9. **Fugitive Dust/Emission Controls** - Fugitive particulate emissions from the collection, transfer and handling of wood waste shall be controlled by covering of all conveyors or complete enclosure.
(9 VAC 5-50-90, 9 VAC 5-50-260, and 9 VAC 5-80-1180)

10. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ's Northern Regional Office (NRO). These records shall include, but are not limited to:

    a. Annual number of cabinets produced through woodworking and machining operations, calculated monthly as the sum of each consecutive twelve month period.

    b. Annual emissions calculations of PM-10 from the woodworking and machining operation, calculated monthly as the sum of each consecutive twelve month period.

    c. Operation and control device monitoring records for the baghouses.

    d. Scheduled and unscheduled maintenance, and operator training.

    e. Baghouse design efficiency specifications from the equipment manufacturer.

    These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
    (9 VAC 5-50-50 and 9 VAC 5-80-1180)

WOOD COATING CONDITIONS

11. **Emission Controls** - Particulate emissions from the spray booths shall be controlled by fiberglass filters or equivalent. The spray booths shall be provided with adequate access for inspection.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

12. **Emissions Testing & Monitoring** - The spray booths shall be constructed to allow for testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30F)

13. **Emission Controls** - Volatile Organic Compound emissions from the spray booths shall be minimized by the use of high volume low pressure (HVLP) or equivalent spray guns.
(9 VAC 5-50-260)

14. **Plantwide Emission Limits** - Total Volatile Organic Compound emissions from the facility shall not exceed the limits specified below:

Volatile Organic Compounds	282.0 lbs/hr	247.0 tons/yr

(9 VAC 5-50-260 and 9 VAC 5-80-1180)

15. **Visible Emission Limit** - Visible emissions from each furniture finishing spray booth exhaust and each curing oven exhaust shall not exceed five percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-50-80, 9 VAC 5-50-260 and 9 VAC 5-80-1180)

16. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the affected facility shall be operated in compliance with the requirements of 40 CFR 63, Subpart JJ.
(9 VAC 5-50-400 and 9 VAC 5-50-410)

17. **On-Site Records** – The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO. These records shall include, but are not limited to:

    a. Annual consumption of each VOC containing coating, thinner, and cleaning solvent, calculated monthly as the sum of each consecutive twelve-month period.

    b. Material Safety Data Sheets or other vendor information showing VOC content, water content, and solids content for each coating, thinner, and cleaning solvent used.

    c. Annual emissions of VOC's to verify compliance with emission limits listed in Condition 14. Annual emissions shall be calculated monthly as the sum of each consecutive twelve-month period.

    These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
    (9 VAC 5-80-1180 and 9 VAC 5-50-50)

CONTINUING COMPLIANCE DETERMINATION

18. **Emissions Testing & Monitoring** - The permitted facility shall be constructed to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30F)

19. **Visible Emissions Evaluation** - Upon request by the DEQ, the permittee shall conduct additional visible emission evaluations from the exhaust stacks to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO.
(9 VAC 5-80-1200 and 9 VAC 5-50-30 G)

CORRESPONDENCE AND SUBMITTALS

20. All correspondence concerning this permit should be submitted to the following address -

Regional Air Compliance Manager
Department of Environmental Quality (DEQ)
Northern Regional Office (NRO)
13901 Crown Court
Woodbridge, VA 22193

All submittals to the Administrator, as required in 40 CFR 63 (MACT), Subpart JJ, shall be sent to DEQ (address above) and to EPA Region III at the following address:

Wood Furniture NESHAP Coordinator
U. S. Environmental Protection Agency, Region III
Air Protection Division (3AP10)
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-50-50, 9 VAC 5-60-90, and 40 CFR 63.9(b)(4) and 63.13)

MACT CONDITIONS

21. Except as specified in this permit, the facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ.
(9 VAC 5-60-90 and 40 CFR 63.800(f))

22. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the limits specified in 40 CFR 63.802(b). Compliance with 40 CFR 63.802(b) shall be demonstrated as specified in 63.804(d) and (e)(1).

a. Compliance with 40 CFR 63.802(b)(1) shall be accomplished by either or both of the following methods:

   i. Calculate the average VHAP content across all finishing materials used at the facility using Equation 1 in 40 CFR 63.804(a)(1), and maintain a value of E no greater than 0.8 lb VHAP per pound of solids as applied; and/or

   ii. Apply compliant finishing materials which meet the following specifications:

      (a) Each sealer and topcoat has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied;

      (b) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

      (c) Each thinner contains no more than 10.0 percent VHAP by weight;

      (d) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied;

      (e) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 lb VHAP/lb solids and a thinner containing no more than 3.0 percent HAP by weight.

b. Compliant contact adhesives shall be used that have a VHAP content no greater than 0.2 lb VHAP/lb solids, as applied;

c. Strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied.

(9 VAC 5-60-90, 40 CFR 63.802(b), 63.803, and 63.804(d)(2) & (e)(1))

23. Each time a notification of compliance status is required, the permittee shall submit to the Regional Air Compliance Manager of the DEQ's NRO a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with 40 CFR 63, Subpart JJ. The notification shall list:

   a. The methods that were used to determine compliance;

   b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

   c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;

e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);

f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

g. A statement by the permittee as to whether the facility has complied with the relevant standards or other requirements.

The notification shall be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in 40 CFR 63, Subpart JJ.

A copy of all notifications and compliance certifications shall be addressed to U.S. EPA Region III, National Emissions Standards for Wood Furniture Manufacturing Operations, Subpart JJ NESHAP Coordinator (3AP10) at the address in Condition 20.
(9 VAC 5-60-90 and 40 CFR 63.9(h))

24. The permittee shall demonstrate continuous compliance by 1) using compliant coatings and thinners or by calculating the average VHAP content of the finishing materials applied, 2) maintaining records that demonstrate the compliant coatings and thinners are compliant, and 3) submitting a compliance certification with the semiannual report. The compliance certification shall state or demonstrate:

a. That compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The permittee is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used; or

That the average calculation of Equation 1 in 40 CFR 63.804(a)(1) for each month within the semiannual reporting period is in compliance with the 0.8 lbs VHAP/lb solids standards. The permittee is in violation of the standard when the calculated average VHAP content exceeds the standard for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

b. That compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact and/or foam adhesive is used is a single violation of the standard.

c. That compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

d. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that a permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

(9 VAC 5-60-90 and 40 CFR 63.804(g)(2), (5), (7), (8))

25. The permittee shall submit a report to the Regional Air Compliance Manager of the DEQ's NRO covering the previous six months of wood furniture manufacturing operations, as following:

a. The reports shall be submitted thirty calendar days after the end of each six-month period, and no later than March 1 and September 1 of each calendar year.

b. The semiannual reports shall include the information required by Condition 24, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

c. The frequency of the reports required by paragraph b. of this condition shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

d. The compliance certification shall be signed by a responsible official of the company that owns or operates the facility.

A copy of each report shall be submitted also to the U.S. EPA Region III, National Emissions Standards for Wood Furniture Manufacturing Operations, Subpart JJ NESHAP Coordinator (3AP10) at the address in condition 20.

(9 VAC 5-60-90 and 40 CFR 63.807(c))

26. The permittee shall meet the following operation and maintenance requirements:

a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

b. Malfunctions shall be corrected as soon as practicable after their occurrence.

c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
(9 VAC 5-60-90 and 40 CFR 63.6(e))

27. The permittee shall develop and implement the following work practice standards:

a. Work Practice Implementation Plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the wood furniture manufacturing operation and addresses each of the work practice standards presented below (in this condition). The plan shall be developed no more than sixty days after startup. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

b. Operator Training Course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and wash-off operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of startup. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

i. A list of all current personnel by name and job description that are required to be trained;

ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash-off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

c. Inspection and Maintenance Plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;

ii. An inspection schedule;

iii. Methods for documenting the date and results of each inspection and any repairs that were made;

iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(2) Final repairs shall be made within fifteen calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

d. Cleaning and Wash-Off Solvent Accounting System - The permittee shall develop an organic solvent accounting form to record:

i. The quantity and type of organic solvent used each month for wash-off and cleaning, as defined in 40 CFR 63.801 of Subpart JJ;

ii. The number of pieces washed off, and the reason for the wash-off; and

iii. The quantity of spent solvent generated from each wash-off and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

e. Chemical Composition of Cleaning and Wash-Off Solvents - The permittee shall not use cleaning or wash-off solvents that contain any of the pollutants listed in Table 4 of Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.

f. Spray Booth Cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

g. Storage Requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and wash-off materials.

h. Application Equipment Requirements - As of November 21, 2014, each owner or operator of an affected source shall not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device. Prior to November 21, 2014, the permittee may use conventional air spray guns to apply finishing materials only under any of the following circumstances:

i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

ii. For touchup and repair under the following conditions:

(1) The touchup and repair occurs after completion of the finishing operation; or

(2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

iv. When emissions from the finishing application station are directed to a control device;

v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:

(1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

i. Line Cleaning - The permittee shall pump or drain all organic solvent used for line cleaning into a normally closed container.

j. Gun Cleaning - The permittee shall collect all organic solvent used to clean spray guns into a normally closed container.

k. Wash-Off Operations - The permittee shall control emissions from wash-off operations by:

i. Using normally closed tanks for wash-off; and

ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

i. Identifies VHAP from the list presented in Table 5 of 40 CFR Subpart 63, Subpart JJ that are being used in finishing operations;

ii. Establishes a baseline level of usage, as defined in 40 CFR 63.803, for each VHAP identified.

iii. Tracks the annual usage of each VHAP identified.

iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

1) The exceedance is no more than 15.0 percent above the baseline level;

2) Usage of the VHAP is below the de minimis level presented in Table 5 of 40 CFR 63, Subpart JJ for that VHAP;

3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.

v. If none of the explanations listed in 40 CFR 63, Subpart JJ are the reason for the increase, the permittee shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage.

vi. If the facility uses a VHAP of potential concern listed in Table 6, 40 CFR 63, Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of

Subpart JJ for that chemical, then the permittee shall provide an explanation to the Regional Air Compliance Manager of the DEQ's NRO and the Administrator that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition iv. above, the affected source shall follow the procedures established in Condition v. above.

(9 VAC 5-60-90 and 40 CFR 63.803(a)-(l))

28. The permittee shall maintain records of the following:

a. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in 40 CFR 63, Subpart JJ,

b. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in 40 CFR 63, Subpart JJ; and

c. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in 40 CFR 63, Subpart JJ.

d. A copy of the averaging calculations for each month as well as the data on the quantity of coating and thinners used that is necessary to support the calculation of the average VHAP content of all finishing materials (Equation 1 of 40 CFR 63.804(a)(1), Subpart J).

e. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

i. Records demonstrating that the operator training program required is in place;

ii. Records collected in accordance with the inspection and maintenance plan;
iii. Records associated with the cleaning solvent accounting system;

iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period;

v. Records associated with the formulation assessment plan; and

vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

f. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following startup.

g. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.

The permittee shall maintain files of all information (including all reports and notifications) required), recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
(9 VAC 5-60-90, 40 CFR 63.806(a), (b), (e), (h), (i), (j) & 63.10(b)(1))

GENERAL CONDITIONS

29. **Certification of Documents**

A. The following documents submitted to the board shall be signed by a responsible official: (i) any emission statement, application, form, report, or compliance certification; (ii) any document required to be signed by any provision of the regulations of the board; or (iii) any other document containing emissions data or compliance information the owner wishes the board to consider in the administration of its air quality programs. A responsible official is defined as follows:

1. For a business entity, such as a corporation, association or cooperative, a responsible official is either:

   a. The president, secretary, treasurer, or a vice president of the business entity in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the business entity; or

   b. A duly authorized representative of such business entity if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars) or (ii) the authority to sign documents has been assigned or delegated to such representative in accordance with procedures of the business entity.

2. For a partnership or sole proprietorship, a responsible official is a general partner or the proprietor, respectively.

3. For a municipality, state, federal, or other public agency, a responsible official is either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of the a principal geographic unit of the agency.

B. Any person signing a document under subsection A above shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on

my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

C. Subsection B shall be interpreted to mean that the signer must have some form of direction or supervision over the persons gathering the data and preparing the document (the preparers), although the signer need not personally nor directly supervise these activities. The signer need not be in the same line of authority as the preparers, or do the persons gathering the form need to be employees (e.g., outside contractors can be used). It is sufficient that the signer has authority to assure that the necessary actions are taken to prepare a complete and accurate document.

(9 VAC 5-20-230)

30. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

a. Knowingly makes material misstatements in the application for this permit or any amendments to it;

b. Fails to comply with the conditions of this permit;

c. Fails to comply with any emission standards applicable to a permitted emissions unit;

d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard;

e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted;

(9 VAC 5-80-1210 G)

31. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-1180)

32. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Regional Air Compliance Manager of the DEQ's NRO of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Regional Air Compliance Manager of the DEQ's NRO in writing.
(9 VAC 5-20-180 C)

33. **Notification for Control Equipment Maintenance** - The permittee shall furnish notification to the Regional Air Compliance Manager of the DEQ's NRO of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:

    a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;

    b. The expected length of time that the air pollution control equipment will be out of service;

    c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;

    d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

    (9 VAC 5-20-180 B)

34. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)

35. **Fugitive Dust & VOC Emission Controls** - Fugitive emission controls shall include the following, or equivalent, as a minimum:

    a. All material being stockpiled shall be kept adequately moist to control dust during storage and handling or covered at all times to minimize emissions.

    b. Dust from haul roads and traffic areas shall be controlled by the application of asphalt, water, suitable chemicals, or equivalent methods approved by the DEQ.

c. Reasonable precautions shall be taken to prevent deposition of dirt on public roads and subsequent dust emissions. Dirt, product, or raw material spilled or tracked onto paved surfaces shall be promptly removed to prevent particulate matter from becoming airborne.

d. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.

(9 VAC 5-50-260, 9 VAC 5-50-90 and 9 VAC 5-80-1180)

36. **Maintenance/Operating Procedures** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

b. Maintain an inventory of spare parts.

c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)

37. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Regional Air Compliance Manager of the DEQ's NRO of the change of ownership within thirty days of the transfer.
(9 VAC 5-80-1240)

38. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-1180)

Attachment C - Fabric Filter (Baghouse) (Unit: BH1) – Compliance Assurance Monitoring (CAM) Plan

	Indicator 1	Indicator 2	Indicator 3
	Opacity	**Visible Emission Evaluation (optional - to determine if excursion occurs**	**Periodic Structural Inspections**
Measurement approach	Daily visible emission observations conducted at the control device (baghouse) emission point.	Method 9 VEE in accordance with 40 CFR 60, Appendix A conducted optionally to determine if an excursion occurs. Results recorded upon completion of each Method 9. If visible emissions are observed by Indicator 1 and a Method 9 VEE is not conducted, then an excursion has occurred.	Monthly external bag filter inspections by a qualified employee. Results recorded monthly. Annual internal bag filter inspection by a qualified employee. Results recorded upon completion of each inspection.
Indicator range	An excursion is defined as the presence of any visible emission from the control device (baghouse) unless otherwise determined by a Method 9 VEE.	An excursion is defined as an average opacity greater than 5% during one six-minute period in any one hour.	An excursion is defined as failure to perform the monthly or annual inspection of bag filters. Excursions trigger an inspection, corrective action and reporting requirement.
QIP Threshold	More than 3 excursions in a 2 week period for the control device.	More than 3 excursions in a 2 week period for the control device.	Not Applicable
Performance criteria: **Data representativeness**	Observation of visible emissions indicates possible damage to fabric filter (baghouse).	Observation of visible emissions greater than 5% indicates replacement or maintenance of bag filters is necessary.	Bags in the fabric filter shall be inspected visually for deterioration and remaining bag life monitored.
Verification of operational status	Records that indicate time, facility operational status and results of each observation.	Pressure drop across the fabric filter (baghouse).	Pressure drop across the fabric filter (baghouse).
QA/QC practices and criteria	Trained personnel to perform observations.	Trained personnel shall perform Method 9. One copy of the test results shall be submitted to the Valley Regional Office within 45 days after completion.	Trained personnel perform the inspection and maintenance.
Monitoring frequency and data collection procedure	Daily observation.	Upon the observation of visible emissions from the fabric filter (baghouse).	Monthly and annual inspections.