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13-2449I
045-0003



Caperton Furnitureworks, LLC

Berkeley Springs, West Virginia

Plant ID No. 065 – 00003

Application for
Class II Administrative Update to
Permit No. R13-2449H

April 2015

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.wvdep.org/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

- CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office):

Caperton Furnitureworks, LLC

2. Federal Employer ID No. (FEIN):

550747153

3. Name of facility (if different from above):

Same

4. The applicant is the:

- OWNER OPERATOR BOTH

5A. Applicant's mailing address:

5270 Valley Road
Berkeley Springs, WV 25411

5B. Facility's present physical address:

5270 Valley Road
Berkeley Springs, WV 25411

6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? YES NO

- If YES, provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A**.
- If NO, provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A**.

7. If applicant is a subsidiary corporation, please provide the name of parent corporation:

8. Does the applicant own, lease, have an option to buy or otherwise have control of the proposed site? YES NO

- If YES, please explain: Applicant owns the site.
- If NO, you are not eligible for a permit for this source.

9. Type of plant or facility (stationary source) to be **constructed, modified, relocated, administratively updated** or **temporarily permitted** (e.g., coal preparation plant, primary crusher, etc.):

Replace the paint booth 3S and relocate it from the Old Finishing Room to the New Finishing Room.

10. Standard Industrial Classification (SIC) code for the facility:

2511

11A. DAQ Plant ID No. (for existing facilities only):

065 - 00003

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):

R13-2449H

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

From I-68, travel south on Route 522. Continue on Route 522 approximately 5 miles past Route 522 and Route 9 intersection. Facility is adjacent to Route 522.

12.B. New site address (if applicable): N/A	12C. Nearest city or town: Berkeley Springs	12D. County: Morgan
12.E. UTM Northing (KM): 4,389.6	12F. UTM Easting (KM): 737.8	12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:
 Caperton Furnitureworks, LLC, proposes replace the paint booth 3S and relocate it from the Old Finishing Room to the New Finishing Room. No change in emissions will result from the replacement and relocation of this emission source.

14A. Provide the date of anticipated installation or change: ASAP <ul style="list-style-type: none"> - If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: 	14B. Date of anticipated Start-Up if a permit is granted: 8/1/2015
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14C. Provide a **Schedule** of the planned **Installation of/Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:
 Hours Per Day 10 Days Per Week 6 Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved? YES NO

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to **Plot Plan Guidance**) .
 - Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.
 - Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.
 – For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify: Paint Booth		

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input checked="" type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System
<input type="checkbox"/> Other Collectors, specify		

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE  DATE: 4/29/15
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Terry D. Frost		35C. Title: Vice President of Finance
35D. E-mail: terryf@gatcreek.com	36E. Phone: (304) 258-2343	36F. FAX: (304) 258-0977
36A. Printed name of contact person (if different from above): Jennie Henthorn		36B. Title: Owner Henthorn Environmental Services LLC
36C. E-mail: jhenthorn@henthornenv.com	36D. Phone: (304) 727-1445	36E. FAX: (304) 727-1554

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

<input checked="" type="checkbox"/> Attachment A: Business Certificate	<input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet
<input checked="" type="checkbox"/> Attachment B: Map(s)	<input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)
<input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule	<input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)
<input checked="" type="checkbox"/> Attachment D: Regulatory Discussion	<input type="checkbox"/> Attachment N: Supporting Emissions Calculations
<input checked="" type="checkbox"/> Attachment E: Plot Plan	<input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans
<input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)	<input checked="" type="checkbox"/> Attachment P: Public Notice
<input checked="" type="checkbox"/> Attachment G: Process Description	<input type="checkbox"/> Attachment Q: Business Confidential Claims
<input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)	<input type="checkbox"/> Attachment R: Authority Forms
<input type="checkbox"/> Attachment I: Emission Units Table	<input type="checkbox"/> Attachment S: Title V Permit Revision Information
<input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet	<input checked="" type="checkbox"/> Application Fee

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY - IF THIS IS A TITLE V SOURCE:

Forward 1 copy of the application to the Title V Permitting Group and:

For Title V Administrative Amendments:

NSR permit writer should notify Title V permit writer of draft permit,

For Title V Minor Modifications:

Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,

NSR permit writer should notify Title V permit writer of draft permit.

For Title V Significant Modifications processed in parallel with NSR Permit revision:

NSR permit writer should notify a Title V permit writer of draft permit,

Public notice should reference both 45CSR13 and Title V permits,

EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment A

Business Certificate

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
**CAPERSON FURNITUREWORKS LLC
4 MILES SOUTH 522
BERKELEY SPRINGS, WV 25411-0000**

BUSINESS REGISTRATION ACCOUNT NUMBER: 1044-1025

This certificate is issued on: **06/3/2011**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code.*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued.

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

**TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of
this certificate displayed at every job site within West Virginia.**

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Attachment B

Location Map



Attachment B
Site Location Map

USGS 7.5 Minute Series Topographic Map
Great Cacapon and Stotlers Crossroads,
W.Va. Quadrangles

Henthorn Environmental Services LLC

Attachment C

Schedule of Installation

Attachment C

Schedule of Installation

Caperton Furnitureworks, LLC (Caperton) plans to purchase the new equipment for the paint booth and relocate Emission Source 3S as soon as allowed by the West Virginia Department of Environmental Protection (DEP). To allow for installation of the booth in advance of the busy season, Caperton needs to purchase the necessary equipment no later than June 1, 2015.

Attachment D

Regulatory Discussion

Attachment D

Regulatory Discussion

As no change in emissions will occur based on the relocation of the paint booth 3S, no regulations are invoked as part of this revision. This application is being submitted as a Class II administrative update to allow the process flow diagram and facility map to match the proposed configuration of the facility.

Attachment E

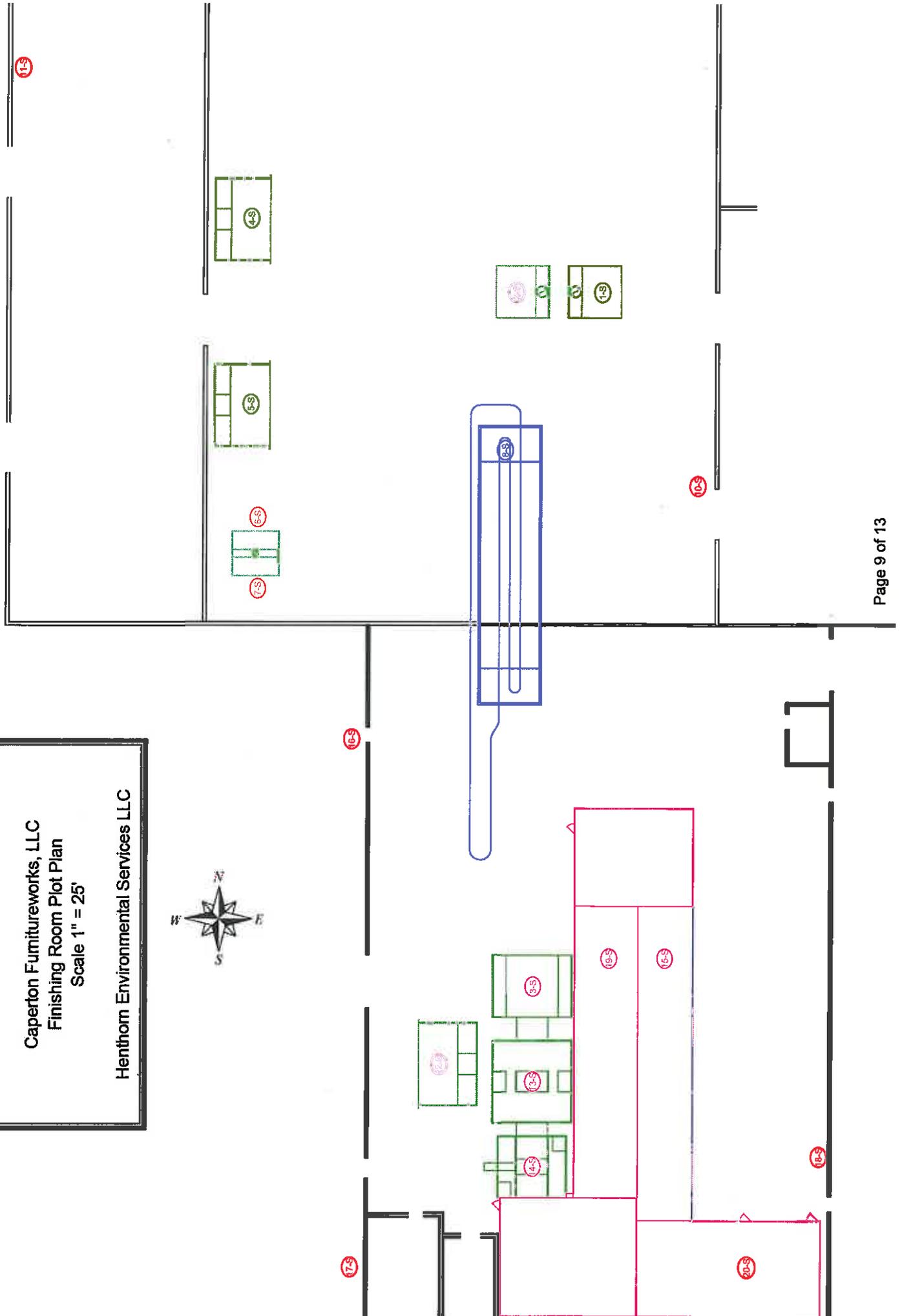
Plot Plan

Attachment E

Caperton Furnitureworks, LLC
Finishing Room Plot Plan

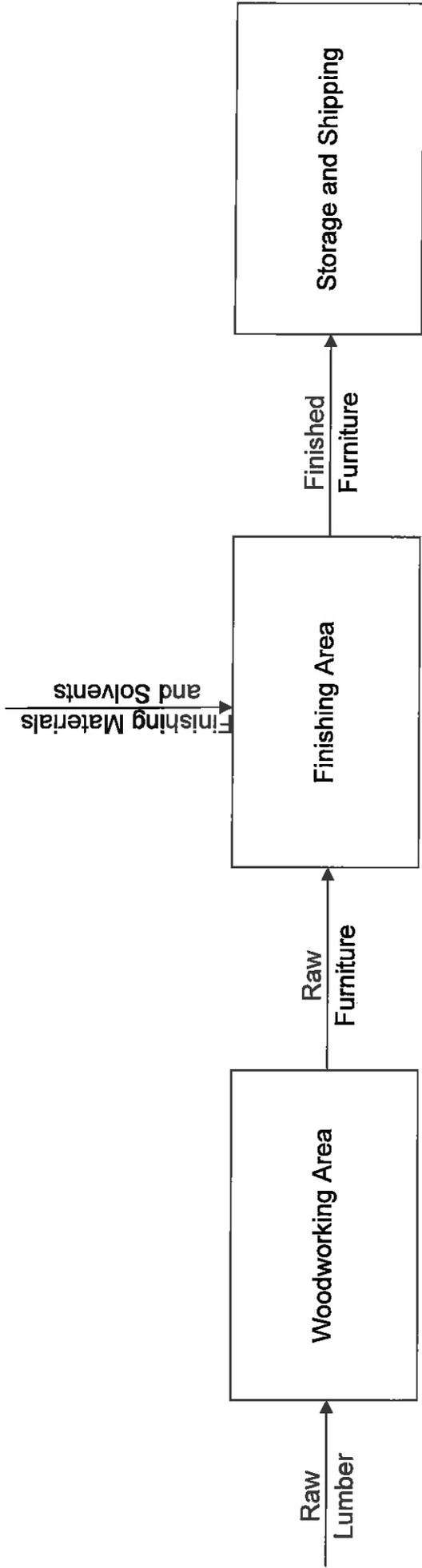
Scale 1" = 25'

Henthorn Environmental Services LLC



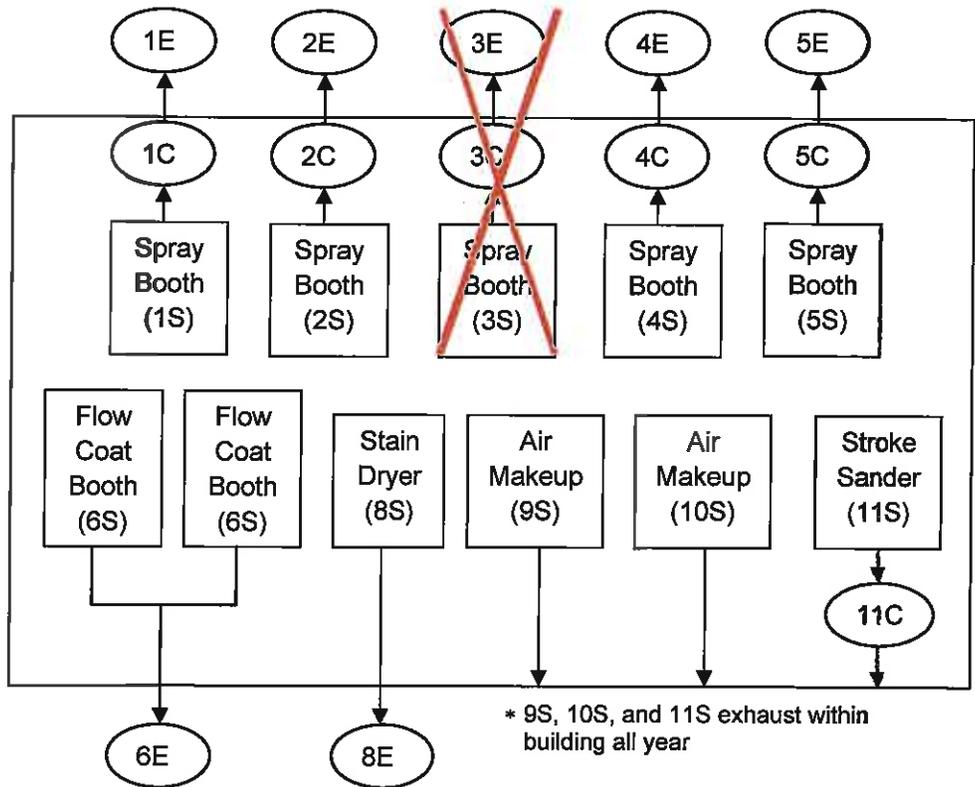
Attachment F

Process Flow Diagram

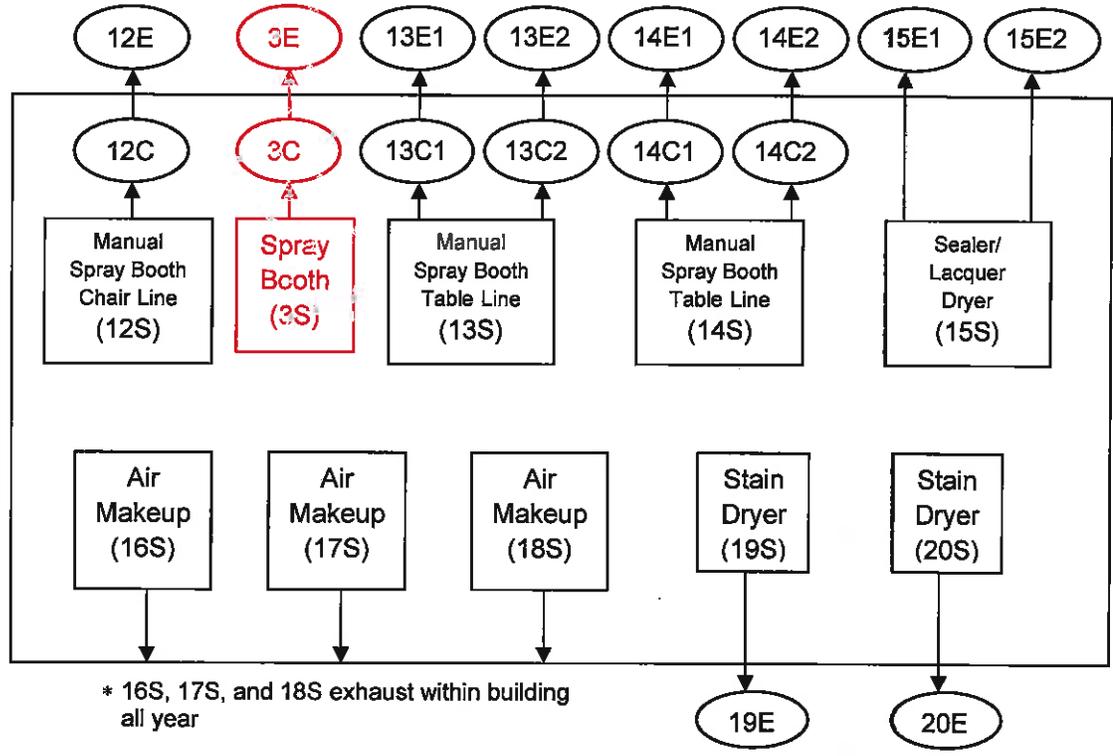


Attachment F-1
Caperton Furnitureworks, LLC
General Process Flow Diagram
Henthorn Environmental Services LLC

Old Finishing Room



New Finishing Building



Attachment F-2
 Caperton Furnitureworks, LLC
 Finishing Area Process Flow Diagram
 Henthorn Environmental Services LLC

Attachment G

Process Description

Attachment G

Process Description

Caperton Furnitureworks, LLC, (Caperton) proposes to replace existing paint booth 3S (located in the old finishing room) with a new paint booth, to be located in the new finishing room immediately prior to existing booth 13S. The booth will be constructed in a similar manner to existing booths at the facility, and no change will occur with the coatings utilized at the facility or in the emissions from the facility as a result of the replacement and relocation of paint booth 3S.

Pursuant to the permit modification issued to Caperton in 2003, the emissions of VOCs and HAPs from the facility's coating operations are limited facility-wide on a twelve-month rolling basis. Caperton does not propose any modifications to the facility's hours of operation, emissions limitations, or recordkeeping requirements based on the replacement and relocation of paint booth 3S.

No other changes are planned at the facility, and existing emissions units which are unaffected by this permit modification are not discussed herein.

Attachment P

Legal Advertisement

AIR QUALITY PERMIT NOTICE

Notice of Application

Notice is given that Caperton Furnitureworks, LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Administrative Update for a replacement spray booth at its furniture manufacturing facility located at 5270 Valley Road, Berkeley Springs, WV 25411 in Morgan County, West Virginia. The latitude and longitude coordinates are: 38.557049° latitude, -78.267341° longitude.

As the new spray booth replaces an existing booth at the facility, the applicant estimates no change in the potential to discharge Regulated Air Pollutants.

Startup of operation is planned to begin on or about the 1st day of August, 2015. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 4th day of May, 2015.

By: Caperton Furnitureworks, LLC
Terry D. Frost
Vice President of Finance
5270 Valley Road
Berkeley Springs, West Virginia 25411