

Permit Writer	Joe Kessler
Email Address	joseph.r.kessler@wv.gov
Company Name	Greenfield Cabinetry, LLC
Company ID	083-00104
Facility Name	Elkins
Permit Number	R13-2315F
County	Randolph
Newspaper	<i>legals @ theintermountain.com</i> <i>The Inter-Mountain</i> <i>636-2121</i>
Company Contact & Email	Mr. Jonathon Riffle Jonathan.Riffle@thecorsigroup.com
Consultant Email Address	n/a
Regional Office (if applicable)	n/a

*Publish Fri Aug 28 2015*  
*30 days Mon Sept 28 2015*

*Email conf*  
*read 8/27 \$65.50*  
*Emailed to EPA, etc*  
*8/27*

# AIR QUALITY PERMIT NOTICE

## Notice of Intent to Approve

On May 20, 2015, Greenfield Cabinetry, LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify the Elkins cabinet manufacturing facility located 888 Industrial Park Road, Elkins, Randolph County, WV at latitude 38.91984 and longitude -79.85916. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-2315F.

The following changes in potential emissions will be authorized by this permit action: Particulate Matter less than 2.5 microns, 1.98 tons per year (TPY); Particulate Matter less than 10 microns, 1.98 TPY; Particulate Matter, 1.98 TPY; Volatile Organic Compounds, 47.34 TPY; Hazardous Air Pollutants 0.12 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on **XXXXXX**. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Joe Kessler, PE  
WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304  
Telephone: 304/926-0499, ext. 1219  
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

*[www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx](http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx)*

## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Thursday, August 27, 2015 3:59 PM  
**To:** wentworth.paul@epa.gov; bradley.megan@epa.gov; jonathan.riffle@thecorsigroup.com  
**Cc:** Durham, William F; McKeone, Beverly D; McCumbers, Carrie; Hammonds, Stephanie E; Taylor, Danielle R; Kessler, Joseph R  
**Subject:** WV Draft Permit R13-2315F for Greenfield Cabinetry, LLC; Elkins  
**Attachments:** 2315F.pdf; Eval2315F.pdf; notice.pdf

Please find attached the Draft Permit R13-2315F, Engineering Evaluation, and Public Notice for Greenfield Cabinetry, LLC located in Elkins, Randolph County.

The notice will be published in *The Inter-Mountain* on Friday, August 28, 2015, and the thirty day public comment period will end on Monday, September 28, 2015.

Should you have any questions or comments, please contact the permit writer, Joe Kessler, at 304 926-0499 x1219.

## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Thursday, August 27, 2015 3:22 PM  
**To:** Wheeler, Cathy L  
**Cc:** Kessler, Joseph R  
**Subject:** DAQ Public Notice

Please see below the Public Notice for Draft Permit R13-2315F for Greenfield Cabinetry, LLC located in Elkins, Randolph County.

The notice will be published in *The Inter-Mountain* on Friday, August 28, 2015, and the thirty day public comment period will end on Monday, September 28, 2015.

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Joe Kessler, PE

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

Telephone: 304/926-0499, ext. 1219

FAX: 304/926-0478

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## **Kessler, Joseph R**

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**From:** Adkins, Sandra K  
**Sent:** Thursday, August 27, 2015 8:56 AM  
**To:** legals@theintermountain.com  
**Cc:** Kessler, Joseph R  
**Subject:** Publication of Class I Legal Ad for the WV Division of Air Quality

Please publish the information below as a Class I legal advertisement (one time only) in the Friday, August 28, 2015, issue of *The Inter-Mountain*. Please let me know that this has been received and will be published as requested. Thank you.

Send the invoice for payment and affidavit of publication to:

**Sandra Adkins**

**WV Department of Environmental Protection  
DIVISION OF AIR QUALITY**

**601- 57th Street**

**Charleston, WV 25304**

Thank you for your assistance. Should you have any questions, please contact me at 304-926-0499 x1250.

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*West Virginia Department of Environmental Protection*

*Earl Ray Tomblin  
Governor*

*Division of Air Quality*

*Randy C. Huffman  
Cabinet Secretary*

# Permit to Modify



*Entire Document*  
**NON-CONFIDENTIAL**

**R13-2315F**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

Issued to:  
**Greenfield Cabinetry, LLC**  
**Elkins Cabinet Production Facility**  
**083-00104**

**DRAFT**

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*William F. Durham  
Director*

*Issued: DRAFT*

*This permit will supercede and replace Permit R13-2315E issued on February 10, 2014.*

Facility Location: Elkins, Randolph County, West Virginia  
Mailing Address: 888 Industrial Park Road, Elkins, WV 26241  
Facility Description: Cabinet Production Facility  
NAICS Codes: 337110  
UTM Coordinates: 598.90 km Easting • 4,308.50 km Northing • Zone 17  
Latitude/Longitude: 38.91984/-79.859161  
Permit Type: Modification  
Desc. of Change: Addition of a new spray booth.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [ §§ 22B-1-1 et seq. ], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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*The source is not subject to 45CSR30.*

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### 1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
SB-01	E-SB-01	Surface Coating Booth and Cleanup	1999	n/a	OF-1 <sup>(1)</sup>
SB-02	E-SB-02	Surface Coating Booth and Cleanup	1999	n/a	OF-2 <sup>(1)</sup>
SB-03	E-SB-03	Surface Coating Booth and Cleanup	1999	n/a	OF-3 <sup>(1)</sup>
SB-04	E-SB-04	Surface Coating Booth and Cleanup	2015	n/a	OF-4 <sup>(1)</sup>
CS-04	E-CS-04	Curing Oven	1999	n/a	none
CS-05	E-CS-05	Curing Oven	1999	n/a	none
B-01	E-B-01	Natural Gas Fired Boiler	1999	0.50 mmBtu/hr	none

(1) Fiberglass mat filter.

## 2.0. General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppmv or ppmv</b>	Parts per million by volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Authority**

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation.*

### **2.4. Term and Renewal**

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2315E. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2315 through R13-2315F and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; [45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

## **2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

## **2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.  
[45CSR§13-4]

## **2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.  
[45CSR§13-5.4.]

## **2.10. Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.  
[45CSR§13-5.1]

## **2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

## **2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

### **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

### **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

### **2.15. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.

**2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.  
[45CSR§11-5.2.]

#### 3.2. Monitoring Requirements

- 3.2.1. **Emission Limit Averaging Time.** Unless otherwise specified, compliance with all annual limits shall be based on a rolling twelve month total. A rolling twelve month total shall be the sum of the measured parameter of the previous twelve calendar months. Compliance with all hourly emission limits shall be based on the applicable NAAQS averaging times or, where applicable, as given in any approved performance test method.

### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
  - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
  - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
  - d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

### 3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.  
[45CSR§4. *State-Enforceable only.*]

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W. Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304-2345

**If to the USEPA:**

Associate Director  
Office of Air Enforcement and Compliance Assistance  
(3AP20)  
U. S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**3.5.4. Operating Fee.**

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

**3.5.5. Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

#### 4.0. Source-Specific Requirements

##### 4.1. Limitations and Standards

- 4.1.1. Only those emission units/sources as identified in Table 1.0, with the exception of any *de minimis* sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility. In accordance with the information filed in Permit Application R13-2315 through R13-2315F, the emission units/sources identified under Table 1.0 of this permit shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants, shall not exceed the listed maximum design capacities, and shall use the specified control devices.
- 4.1.2. The aggregate emission rates of the listed pollutants from the surface coating operations identified under Table 1.0 shall not exceed the following:

**Table 4.1.2.: Emission Limits**

Pollutant	pounds/hour <sup>(1)</sup>	tons/month	tons/year <sup>(2)</sup>
Volatile Organic Compounds (VOCs)	83.22	10.95	87.62
Particulate Matter	1.06	0.37	2.96
Hazardous Air Pollutants (HAPs) <sup>(3)</sup>	37.45	0.87	6.94
Xylene	16.87	0.48	3.07
Toluene	7.69	0.28	1.02
Ethyl benzene	2.80	0.06	0.49
Methyl Isobutyl Ketone	3.22	0.08	0.60
Glycol Ether	4.44	0.08	0.67
Methanol	1.82	0.13	1.01
Cobalt 2 Ethylhexanoate	0.43	<0.01	<0.01
Chromium II	0.01	<0.01	<0.01
Formaldehyde	0.06	0.01	0.08

- (1) All pound/hour limits are as averaged over one calendar month of operations.
- (2) The annual limits represent a twelve (12) month rolling total limit. A twelve month rolling total shall mean the sum of the emissions for the previous twelve (12) months.
- (3) HAPs are those chemical compounds listed under Section 112(b) of the Clean Air Act Amendments of 1990 and any amendments or revisions thereto. This limit is for the emission of all aggregated HAPs.

- 4.1.3. Use of any material within any of the sources listed under Table 1.0 containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP shall be in accordance with the following:
- a. The permittee shall maintain a Material Safety and Data Sheet (MSDS) or Certified Product Data Sheet (CPDS) for the material on site for a period of at least five (5) years, and be made available to the Director or his/her duly authorized representative upon request;
  - b. The use of the material, if applicable, shall be incorporated into the record keeping requirements contained herein and contribute to the aggregate HAP emission rate as limited under 4.1.2. and recorded under 4.2.1; and

- c. No material containing any toxic air pollutant (TAP), as defined by West Virginia Legislative Rule 45CSR27, Section 2.10., other than formaldehyde (which has received prior approval), shall be used without prior approval of the Director of the Division of Air Quality.
- 4.1.4. Application of surface coatings in sources SB-01, SB-02, SB-03, and SB-04 listed under Table 1.0 shall be in accordance with the following:
- a. High Volume Low Pressure (HVLP) sprayguns shall be installed, maintained, and utilized so as to achieve an average transfer efficiency of 72.5% in the application of any coatings within the spray booths.
- b. The spray booths shall be designed, operated, and maintained with adequate negative pressure so as to capture the maximum amount of overspray from the application of the surface coatings as is reasonably possible.
- c. Fiberglass mat filters, identified as OF-1, OF-2, and OF-3 shall be installed, maintained, and operated so as to achieve a minimum efficiency of 82.5% in the control of particulate matter emissions from the spray booths SB-01, SB-02, and SB-03, respectively. A "Paint Arrestors 3400 Series" fiberglass mat filter, identified as OF-4, shall be installed, maintained, and operated so as to achieve a minimum efficiency of 99% in the control of particulate matter emissions from spray booth SB-04. At such times that is necessary to maintain the minimum particulate matter collection efficiency, OF-1, OF-2, OF-3, and OF-4 shall be replaced with new filters.
- d. For the purposes of compliance calculations performed under 4.2.1(b)(4)(ii), hand wiping of coatings will be assumed to have a transfer efficiency of 100%.
- e. At least monthly, visual inspections of the spray guns, paint booths, and mat filters shall be made so as to ensure the achievement of the minimum transfer/capture/control efficiencies required above. The visual inspection shall be conducted so as to find any defect or deterioration in quality of the spray guns, paint booths, and mat filters that would cause or contribute to a reduction of the transfer/capture/control efficiency to below the minimums required in this section. Upon detection of a defect or a deterioration in quality of any of the equipment, repair or replacement of the affected equipment shall take place prior to any further surface coating operations that utilize said affected equipment. A record of each visual inspection required above shall be maintained on site for a period of no less than three (3) years. Said record shall include, but not be limited to, the date, time, listing of equipment checked, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
- f. Application of surface coatings in sources SB-01, SB-02, SB-03, and SB-04 shall comply with all applicable limitations and standards under 45CSR7, including the requirements given below under (1) through (4).
- (1) No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.  
[45CSR§7-3.1]
- (2) The provisions of subsection 3.1 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.  
[45CSR§7-3.2]

(3) No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

[45CSR§7-4.1]

(4) No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

[45CSR§7-5.1]

(5) The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

[45CSR§7-5.2]

4.1.5. In accordance with information submitted in Permit Applications R13-2315 through R13-2315F, no particulate matter emissions from any woodworking equipment or its associated particulate control device shall be vented into the air outside the facility building.

4.1.6. The boiler, as identified as B-01, used to provide steam for the curing oven, shall not exceed a Maximum Design Heat Input (MDHI) of 0.50 mmBtu/hr and shall combust only natural gas as its fuel. The boiler shall operate in accordance with the following:

a. The maximum emissions from each B-01 shall not exceed the limits given in the following table;

**Table 4.1.6(a): Boiler Emission Limits**

<b>Pollutant</b>	<b>lbs/hr</b>	<b>tons/year</b>
Carbon Monoxide (CO)	0.04	0.18
Oxides of Nitrogen (NO <sub>x</sub> )	0.05	0.22

b. As the annual emission limits given in Table 4.1.6(a) are based on operating 8,760 hours/year, there is no limit on the annual hours of operation or fuel usage of B-01; and

c. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.

[45CSR§2-3.1.]

4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit

or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR§13-5.11.]

#### 4.2. Monitoring and Compliance Demonstration Requirements

4.2.1. For the purposes of determining on-going compliance with the emission limits set forth in 4.1.2., the permittee shall perform the following:

a. The permittee shall maintain records of the following:

- (1) The name and volume (in gallons) of each material, as applied or used, on a monthly basis; and
- (2) The mass of VOC, aggregate and speciated HAPs, and solids per volume of each material, as applied or used, on a monthly basis.

b. The following formulas shall be used to determine the quantities specified in 4.2.1(a) above.

- (1) The mass of VOCs, aggregate and speciated HAPs, and solids per volume (in pounds per gallon) of each material shall be determined by one of the following methods:
  - (i) Certified Product Data Sheets ("Certified Product Data Sheets" shall have the definition assigned to them under 40 CFR 63, Subpart JJ) or an equivalent provided by the material supplier;
  - (ii) A test conducted, or have conducted, by the permittee to determine the applicable quantities using either Method 24 of 40 CFR 60 or a test method approved in advance by the Director;
  - (iii) MSDS's if the material is used in an aggregate amount less than 10 gallons on an annual basis and for which either of the above two options is not reasonable; or
  - (iv) Another method on a case-by-case basis as approved in advance by the Director.
- (2) The mass of VOCs, aggregate and speciated HAPs, and solids of each material, as applied, on a monthly basis, shall be calculated using the following formula:

$$\text{Mass}(\text{pounds of VOCs, HAPs, or Solids/Month}) = A * B$$

Where: A = monthly material usages in gallons per month

B = VOCs, HAPs, or Solids content of the materials used in pounds per gallon as determined under 4.2.1(b)(1).

- (3) The annual, monthly, and hourly emission rates of VOCs and aggregate and speciated HAPs shall be calculated in the following manner:
  - (i) The annual emission rate of VOCs and aggregate and speciated HAPs shall be calculated as the sum of the monthly emission rates of VOCs and aggregate and speciated HAPs, respectively, from the previous twelve (12) months.

- (ii) The monthly emission rate of VOCs and aggregate and speciated HAPs shall be calculated as the mass of VOCs and aggregate and speciated HAPs (as calculated above in 4.2.1(b)(2)), as applied, for the specified month.
- (iii) The hourly emission rates of VOCs and aggregate and speciated HAPs shall be calculated, on a monthly basis, using the following formula:

$$\text{Emission rate(pounds of VOCs, HAPs/Hour)} = C/D$$

Where: C = Mass (pounds of VOCs, aggregate and speciated HAPs/Month)  
D = Monthly hours of surface coating operations

- (4) The annual, monthly, and hourly emission rates of PM shall be calculated in the following manner:

- (i) The annual emission rate of PM shall be calculated as the sum of the monthly emission rate of PM from the previous twelve (12) months.
- (ii) The monthly emission rate of PM shall be calculated using the following formula:

$$\text{Emission rate(PM/month)} = [C*(1-(TE/100))] * [1-((CapEff/100)*(ConEff/100))]$$

Where: C = Mass(pounds of Solids/Month)  
TE = Estimated Minimum Transfer Efficiency of Surface Coating Operations (specified to be 72.5% under 4.1.4(a))  
CapEff = Estimated Minimum Capture Efficiency of Spray Booths (specified to be 100% under 4.1.4(b))  
ConEff = Estimated Minimum Control Efficiency of Mat Filters (specified to be 82.5%/99.0% (as applicable) under 4.1.4(c))

- (iii) The hourly emission rates of PM shall be calculated, on a monthly basis, using the following formula:

$$\text{Emission rate(pounds of PM/Hour)} = C/D$$

Where: C = Mass(pounds of Solids/Month)  
D = Monthly hours of surface coating operations

- c. The following materials may be excluded from actual emissions reporting under this section:
  - (1) those used during non surface-coating or production purposes (e.g., janitorial, maintenance) only; and
  - (2) touch-up markers, can-applied laquers, and contact glue, etc. provided that in no calendar year, as calculated under 4.2.1, VOC emissions do not exceed 1 ton per year.

### 4.3. Testing Requirements

- 4.3.1. At such reasonable time(s) as the Secretary may designate, in accordance with the provisions of 3.3 of this permit, the permittee shall conduct or have conducted test(s) to determine compliance with the

emission limitations or emission control requirements established in this permit and/or applicable regulations.

#### 4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. Within fifteen (15) days of the last day of each month, the permittee shall certify a summary report that contains the following information: hourly, monthly, and rolling 12-month emission rates for VOCs, aggregate and speciated HAPs, and PM from the use (application) of materials (onto a substrate), and

hours of operation of the application of materials at the facility. All records specified in this permit shall be certified as accurate on the form provided as CERTIFICATION OF DATA ACCURACY, be maintained on site for a period of at least five (5) years, and be made available to the Director or his/her duly authorized representative upon request.

For the purposes of this permit, "material" shall be defined as any VOC/HAP/solids-containing surface coating, thinner, or clean-up solvent used in the operation of the spray booth or used on products that have been, or shall be, subject to surface coating within the spray booth.

#### **4.5. Reporting Requirements**

- 4.5.1. The permittee shall submit to the Director, within sixty (60) calendar days of December 31 of each year, a report containing the records as required under 4.2.1. Additionally, the permittee shall submit a certification of compliance with all requirements of this permit. If, during the previous annual period, the permittee had been out of compliance with any part of this permit, it shall be noted along with the following information: 1) the source/equipment/process that was non-compliant and the specific requirement of this permit that was not met, 2) the date the permittee discovered that the source/equipment/process was out of compliance, 3) the date the Director was notified, 4) the corrective measures to get the source/equipment/process back into compliance, and 5) the date the source began to operate in compliance. The submission of any non-compliance report shall give no enforcement action immunity to episodes of non-compliance contained therein.

### CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_ Date \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative

Name and Title \_\_\_\_\_ Title \_\_\_\_\_  
(please print or type) Name

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person 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 a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.



**west virginia department of environmental protection**

Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
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Ear Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
www.dep.wv.gov

**ENGINEERING EVALUATION / FACT SHEET**

**BACKGROUND INFORMATION**

Application No.: R13-2315F  
Plant ID No.: 083-00104  
Applicant: Greenfield Cabinetry, LLC  
Facility Name: Elkins  
Location: Randolph County  
NAICS Code: 337110  
Application Type: Modification  
Received Date: May 18, 2015  
Engineer Assigned: Joe Kessler  
Fee Amount: \$1,000  
Date Received: May 20, 2015  
Complete Date: June 17, 2015  
Due Date: September 15, 2015  
Applicant Ad Date: May 20, 2015  
Newspaper: *The Inter-Mountain*  
UTM's: Easting: 598.90 km Northing: 4,308.50km Zone: 17  
Latitude/Longitude: 38.91984/-79.85916  
Description: Addition of a manual spray booth.

*Entire Document*  
**NON-CONFIDENTIAL**

On May 18, 2015, Greenfield Cabinetry, LLC (Greenfield) submitted a permit application to modify the Elkins Cabinet Manufacturing Facility located in Elkins, Randolph County, WV. The facility was originally permitted under Permit Number R13-2315 on October 28, 1999. Since the issuance of R13-2315, the facility has been the subject of several other new source review (NSR) permitting actions:

- On July 9, 2001, Greenfield was issued a Class I Administrative Update (A/U) as Permit Number R13-2315A for the removal of references to Hazardous Air Pollutants (HAPs) they were no longer using;
- On May 17, 2002, Greenfield was issued a Class I A/U as Permit Number R13-2315B to revise various coating usage limits;
- On September 11, 2002, Greenfield was issued a Class I A/U as Permit Number R13-2315C to revise various coating usage limits;

**Promoting a healthy environment.**

- On February 13, 2003, Greenfield was issued a Class I A/U as Permit Number R13-2315D to change the permit from using material usage based limits to using actual emissions recording for potential-to-emit (PTE) compliance; and
- On February 10, 2014, Greenfield was issued a Class I A/U as Permit Number R13-2315E to modify the requirements related to use of materials containing HAPs.

## **DESCRIPTION OF PROCESS**

### ***Existing Facility***

The Elkins Cabinet Manufacturing Facility produces as a final product assembled wood floor and wall cabinets. To accomplish this, the facility includes woodworking and coating operations. All woodworking operations are controlled by cyclones and bag filters and vented inside the building. As such, any particulate matter emissions exiting the building through the general exhaust fans is expected to be minimal. Coating operations are performed in one of three (3) existing spray booths (SB-01 through SB-03). In each spray booth, all coatings (with the exception of hand wipe varnishes) are applied using High Volume Low Pressure (HVLV) spray guns which limit the amount of particulate matter overspray generated (assumed to have a minimum transfer efficiency of 72.5%). Additionally, each spray booth is controlled by a fiberglass mat filter (with a minimum particulate matter control efficiency of 82.5%).

Other equipment includes two electric curing ovens and a natural gas-fired 0.50 mmBtu/hr boiler for use to provide heat for drying.

### ***Proposed Modifications***

Greenfield is now proposing the addition of one (1) spray booth (SB-04) for additional coating applications. This spray-booth will be similar to the existing booths filters with the exception that SB-04 will be equipped with a "Paint Arrestors 3400 Series" fiberglass mat filter (OF-4) that will achieve a minimum 99% particulate matter control efficiency. The addition of the spray-booth will allow for an expansion in production at the facility and will result in an increase in VOC emissions.

Additionally, Greenfield has updated the worst-case estimates for facility-wide individual speciated HAPs (including HAPs not previously quantified) from surface coating. All HAPs have counted toward the facility-wide total HAPS limit, but not all HAPs were previously speciated with permitted limits.

## **SITE INSPECTION**

Due to the nature of the source and the proposed changes, the writer deemed a site inspection as not necessary. The facility was last inspected by DAQ Compliance/ Enforcement (C/E) Inspector Dan Bauerle on December 13, 2012. As of January 16, 2015, with the submission of required documentation, the facility has been determined to be "Status 30 - In Compliance."

## **AIR EMISSIONS AND CALCULATION METHODOLOGIES**

Greenfield provided in Attachment N of the permit application an emission estimate for both particulate matter and VOCs from the addition of the new spray booth.

### ***VOC Emissions From Coating Operations***

VOC and HAP emissions from all coating operations are based on the VOC/HAP constituent percentages listed in the MSDS or certified product data sheets. It is assumed that all VOCs/HAPs within the coatings volatilize and are emitted (no VOC control devices are used). Although coating operations will take place in four (4) different spray-booths and components are cured in a separate electric infrared station, it is impossible to quantify the VOCs/HAPs to be emitted from each emission point. Furthermore, each spray booth is used for a variety of coating applications and not limited to one type of coating. Therefore, VOC/HAP emission rates are given as an aggregate total emitted from all potential emission points (and any fugitive emissions). This facility-wide emission rate was updated to account for the increase in production associated with the installation of the proposed new spray-booth.

Emission estimates for the application of surface coatings are based on the coating usages for the designated period of time. Maximum annual coating usages are based on the estimated maximum amount of coatings to be used in a twelve-month rolling basis as provided by the applicant. Maximum monthly coating usages are calculated by dividing the annual usages by 12 and providing a 50% safety factor to account for high production months. Maximum hourly coating usages were determined by using the full capacity of the spray guns and the highest VOC/HAP contents of the various coatings used.

### ***Particulate Matter Emissions From Coating Operations***

Particulate matter may be emitted from the coating operations from the overspray generated in the spray booth. The amount of particulate matter in the coatings are based on the solids content of the individual coatings (lb/gal) as given in the MSDS or certified product data sheets. Overspray will be limited through the use of HVLP spray guns with a transfer efficiency of 72.5% (the 72.5% was calculated using vendor information in Permit R13-2315). The remaining overspray is evacuated from the spray-booths and, after passing through a fiberglass particulate filter, is vented up through the stack. The existing particulate filters are given a collection efficiency of 82.5% while the new "Paint Arrestors 3400 Series" filters used on SB-04 will have a collection efficiency of 99% as based on information provided by the vendor and included in the permit application. To be conservative, for the purposes of this calculation, all particulate matter emissions are assumed to be PM<sub>2.5</sub>.

### ***Emissions Summary***

The change in the facility-wide PTE as a result of the proposed addition of the spray booth is given in the following table:

**Table 1: Change In Facility-Wide Annual PTE**

Pollutant	R13-2315E <sup>(1)</sup>		R13-2315F		Change	
	lbs/hour	tons/year	lbs/hour	tons/year	lbs/hour	tons/year
CO	0.04	0.18	0.04	0.18	0.00	0.00
NO <sub>x</sub>	0.05	0.22	0.05	0.22	0.00	0.00
PM <sup>(2)</sup>	0.94	1.00	1.06	2.98	0.12	1.98
SO <sub>2</sub>	<0.01	<0.01	<0.01	<0.01	0.00	0.00
VOCs	38.73	40.29	83.22	87.63	44.49	47.34
Total HAPs	6.54	6.82	37.45	6.94	30.91	0.12
<i>Xylene</i>	3.66	3.81	16.87	3.07	13.21	-0.74
<i>Toluene</i>	2.13	2.21	7.69	1.02	5.56	-1.19
<i>Ethyl benzene</i>	0.64	0.67	2.80	0.49	2.16	-0.18
<i>Methyl Isobutyl Ketone</i> <sup>(3)</sup>	n/a	n/a	3.22	0.60	3.22	0.60
<i>Glycol Ether</i> <sup>(3)</sup>	n/a	n/a	4.44	0.67	4.44	0.67
<i>Methanol</i> <sup>(3)</sup>	n/a	n/a	1.82	1.01	1.82	1.01
<i>Cobalt 2 Ethylhexanoate</i> <sup>(3)</sup>	n/a	n/a	0.43	<0.01	0.43	0.01
<i>Chromium II</i> <sup>(3)</sup>	n/a	n/a	0.01	<0.01	0.01	0.01
<i>Formaldehyde</i> <sup>(3)</sup>	n/a	n/a	0.06	0.08	0.06	0.08

(1) PTE calculated from permit R13-2315E.

(2) All particulate matter emissions are assumed to be less than 2.5 microns. Includes condensables.

(3) These calculated changes reflect paper increases only as these HAPs may have been emitted previously in some quantity but were not limited in the permit.

## **REGULATORY APPLICABILITY**

The following will discuss only the regulatory applicability of general rules and specific rules to the emission units that have been proposed to be modified or added as part of this permitting action.

### ***45CSR7: To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations***

45CSR7 has two substantive requirements applicable to the particulate matter emissions from the proposed spray booth - defined as a "manufacturing process" pursuant to §45-7-2.20. These are the opacity requirements under Section 3 and the mass emission standards under Section 4. Each of these sections will be discussed below.

### 45CSR7 Opacity Standards - Section 3

Section 3.1 sets an opacity limit of 20% on all applicable “source operations” as defined under §45-7-2.38. As noted above, Greenfield has proposed the use of HVLP spray guns and highly efficient filters to control particulate matter emissions from the new spray booth. Proper operation and maintenance of this equipment should maintain any opacity from the proposed spray booth to well below 20%.

### 45CSR7 Weight Emission Standards - Section 4

Section 4.1 of 45CSR7 requires that each manufacturing process source operation or duplicate source operation meet a particulate matter limit based on the weight of material processed through the source operation. The weight of cabinet components that will be coated in the proposed new spray booth is not known. However, the facility-wide particulate matter emission rate from all coating operations can be used to back-calculate the minimum process weight rate that would be needed for compliance. Based on a controlled facility-wide particulate matter emission rate from coating operations of 1.06 lbs/hour, a total process weight rate for type ‘a’ sources from all four spray booths of 883 lbs/hour would be needed for 45CSR7 compliance. It is clear that if all four spray booths were operating at maximum capacity, the throughput of cabinet components would exceed this process weight rate. Additionally, as all potential particulate matter emissions from surface coating is well controlled (see above), the individual and duplicate source operations are expected to easily meet 45CSR7.

### ***45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation***

The proposed changes to the Elkins Cabinet Manufacturing Facility have the potential to increase the PTE of the facility in excess of six (6) lbs/hour and ten (10) TPY (see Table 1 above) and, therefore, pursuant to §45-13-2.17, the changes are defined as a “modification” under 45CSR13. Pursuant to §45-13-5.1, “[n]o person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without . . . obtaining a permit to construct.” Therefore, Greenfield is required to obtain a permit under 45CSR13 for the modification of the facility.

As required under §45-13-8.3 (“Notice Level A”), Greenfield placed a Class I legal advertisement in a “newspaper of *general circulation* in the area where the source is . . . located.” The ad ran on May 20, 2015 in *The Inter-Mountain* and the affidavit of publication for this legal advertisement was submitted on June 4, 2015.

### ***45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration (non-applicability)***

The Elkins Cabinet Manufacturing Facility is defined (see Table 1 above) as an existing “minor stationary source” under 45CSR14 - i.e., PTE of each regulated pollutant is less than 250 TPY. The post-modification facility-wide PTE of each pollutant shall remain below 250 TPY and, therefore, the proposed changes are not defined as a major modification under 45CSR14 and the provisions do not apply.

**45CSR30: Requirements for Operating Permits (non-applicability)**

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The modified Elkins Cabinet Manufacturing Facility does not meet the definition of a "major source under § 112 of the Clean Air Act" as outlined under §45-30-2.26 and clarified (fugitive policy) under 45CSR30b (see Table 1 above) as no regulated pollutant has an emission rate in excess of 100 TPY, no single HAP has an emission rate in excess of 10 TPY, and the facility-wide emission rate of HAPs does not exceed 25 TPY.

**40 CFR 63, Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations**

As a minor source (or "area source") of HAPs (no single HAP has an emission rate in excess of 10 TPY and the facility-wide emission rate of HAPs does not exceed 25 TPY), the Elkins Cabinet Manufacturing Facility is not subject to Subpart JJ.

**TOXICITY ANALYSIS OF NON-CRITERIA REGULATED POLLUTANTS**

This section provides an analysis for those regulated pollutants that may be emitted from the proposed modification and that are not classified as "criteria pollutants." Criteria pollutants are defined as Carbon Monoxide (CO), Lead (Pb), Oxides of Nitrogen (NO<sub>x</sub>), Ozone, Particulate Matter (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>), and Sulfur Dioxide (SO<sub>2</sub>). These pollutants have National Ambient Air Quality Standards (NAAQS) set for each that are designed to protect the public health and welfare. Other pollutants of concern, although designated as non-criteria and without national concentration standards, are regulated through various federal and programs designed to limit their emissions and public exposure. These programs include federal source-specific HAP limits promulgated under 40 CFR 61 (NESHAPS) and 40 CFR 63 (MACT). Any potential applicability to these programs were discussed under REGULATORY APPLICABILITY above.

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. Greenfield has identified the following HAPs as potentially being emitted at the Elkins Cabinet Manufacturing Facility. The following table lists each HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

**Table 2: Potential HAPs - Carcinogenic Risk**

HAPs	Type	Known/Suspected Carcinogen	Classification
Xylene	VOC	No	Inadequate Data
Toluene	VOC	No	Inadequate Data
Ethyl benzene	VOC	No	D- Not Classifiable
Methyl Isobutyl Ketone	VOC	No	Inadequate Data

HAPs	Type	Known/Suspected Carcinogen	Classification
Glycol Ether	VOC	No	No Assessment Available
Methanol	VOC	No	No Assessment Available
Cobalt 2 Ethylhexanoate	PM	No	No Assessment Available
Chromium II	PM	No	No Assessment Available
Formaldehyde	VOC	Yes	B1 - Probable Human Carcinogen

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health affects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at [www.epa.gov/iris](http://www.epa.gov/iris).

### **AIR QUALITY IMPACT ANALYSIS**

The estimated maximum emissions from the modified Elkins Cabinet Manufacturing Facility are less than applicability thresholds that would define the proposed facility as a “major stationary source” under 45CSR14 and, therefore, no air quality impacts modeling analysis was required. Additionally, based on the nature of the proposed modification, modeling was not required under 45CSR13, Section 7.

### **MONITORING, COMPLIANCE DEMONSTRATIONS, REPORTING, AND RECORDING OF OPERATIONS**

No substantive changes to the existing monitoring, compliance demonstrations, reporting or record-keeping requirements were made as part of this permitting process. Compliance with the revised emission limits will continue to be based on monthly actual emissions monitoring, recording, and reporting as given under 4.2.1. of the draft permit.

### **PERFORMANCE TESTING OF OPERATIONS**

No substantive changes to the existing performance testing requirements were made.

### **CHANGES TO PERMIT R13-2315D**

The substantive changes to Permit Number R13-2315D are the following:

Fact Sheet R13-2315F  
Greenfield Cabinetry, LLC  
Elkins

- The new spray booth was added to Table 1.0 Emission Units;
- The spray booth emission limits given under 4.1.2 were updated;
- The higher minimum control efficiency of filter OF-4 was put into requirement 4.1.4(c); and
- The requirement to only hand wipe stains and glazes under 4.1.4(d) has been removed.

**RECOMMENDATION TO DIRECTOR**

The information provided in permit application R13-2315F indicates that compliance with all applicable federal and state air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of Permit Number R13-2315F to Greenfield Cabinetry, LLC for the modification and operation of the Elkins Cabinet Manufacturing Facility located in Elkins, Randolph County, WV.

  
\_\_\_\_\_  
Joe Kessler, PE  
Engineer

8/12/15  
\_\_\_\_\_  
Date

# INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name GREENFIELD CABINETS, LLC

Permitting Action Number R13-2315F Total Days 86 DAQ Days 56

**Permitting Action:**

- |   |                                    |   |
|---|------------------------------------|---|
| <input type="radio"/> Permit Determination  | <input type="radio"/> Temporary    | <input checked="" type="radio"/> Modification |
| <input type="radio"/> General Permit        | <input type="radio"/> Relocation   | <input type="radio"/> PSD (Rule 14)           |
| <input type="radio"/> Administrative Update | <input type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19)          |

**Documents Attached:**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Engineering Evaluation/Memo   | <input checked="" type="checkbox"/> Completed Database Sheet |
| <input checked="" type="checkbox"/> Draft Permit                  | <input type="checkbox"/> Withdrawal                          |
| <input checked="" type="checkbox"/> Notice                        | <input type="checkbox"/> Letter                              |
| <input type="checkbox"/> Denial                                   | <input type="checkbox"/> Other (specify) _____               |
| <input type="checkbox"/> Final Permit/General Permit Registration | _____  |

Date	From	To	Action Requested
8/12/15	Joe Kessler	Bev McKeone	NOTICE APPROVAL
8/25	Bev	Joe	Go to Notice

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).



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west virginia department of environmental protection

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Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

June 17, 2015

Mr. Timothy Clontz, Plant Manager  
Greenfield Cabinetry, LLC  
888 Industrial Park Road  
Elkins, WV 26241

RE: **Application Completeness**  
Greenfield Cabinetry, LLC  
Elkins  
Permit No. R13-2315F  
Plant ID No. 083-00104

Dear Mr. Clontz:

Your application for a modification permit was received by the Division of Air Quality (DAQ) on May 18, 2015 and assigned to the writer for review. Upon an initial review, the application has been deemed complete as of the date of this letter. The ninety (90) day statutory time frame began on that day.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1219.

Sincerely,

*Entire Document*  
**NON-CONFIDENTIAL**



Joe Kessler, PE  
Engineer

## UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

---

FEIN:

Business name: GREENFIELD CABINETRY LLC

Doing business

as/Trading as:

---

Please use your browsers back button to try again.

<a href="#">WorkforceWV</a>	<a href="#">Unemployment Compensation</a>	<a href="#">Offices of the Insurance Commissioner</a>
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## UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

---

FEIN: 550764154  
Business name:  
Doing business  
as/Trading as:

---

Please use your browsers back button to try again.

<a href="#">WorkforceWV</a>	<a href="#">Unemployment Compensation</a>	<a href="#">Offices of the Insurance Commissioner</a>
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## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Wednesday, May 20, 2015 12:49 PM  
**To:** Kessler, Joseph R  
**Subject:** Greenfield Cabinetry/Permit Application Fee

This is the receipt for payment received from:

Greenfield Cabinetry LLC, check number 7052, dated May 11, 2015, \$1,000.00  
Elkins R13-2315F id no 083-00104

OASIS Deposit CR 1500128777 May 20, 2015

*Joe*



# TRANSMITTAL MEMO

7012 MacCorkle Avenue, SE, Charleston, WV 25304 • Phone: (304) 342-1400 • Fax: (304) 343-9031

To: Director  
Division of Air Quality  
WV Department of Environmental Protection  
601 57<sup>th</sup> Street  
Charleston, West Virginia 25304

Date: June 3, 2015  
Project No.: 0101-15-0013



Sent Via:  Mail  Federal Express  United Parcel Service  
 Hand Carried  Other: \_\_\_\_\_

Quantity	Description
1	Affidavit of Publication – Air Quality Permit Notice for Modification to Regulation 13 Permit R13-2315E for the Elkins Cabinet Production Facility – Greenfield Cabinetry, LLC
Remarks: I.D. No. <u>CB3-10104</u> Reg. _____ Company <u>GREENFIELD</u> Facility <u>ELKINS</u> Region _____ Initials <u><i>jm</i></u>	

*Entire Document*  
**NON-CONFIDENTIAL**

By: Patrick E. Ward/rlh  
c: Jonathan Riffle, Greenfield Cabinetry, LLC

State of West Virginia, County of Randolph, ss.

I, Heather Henline, General Manager of THE INTER-MOUNTAIN, a newspaper published at Elkins, in said county, do hereby certify that the annexed advertisement was published on the following dates:

5/20  
20 15 as required by law.

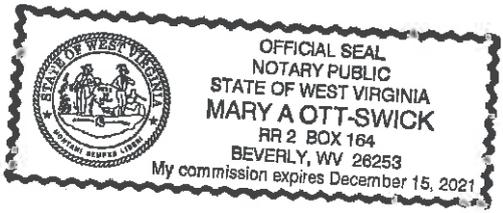
Given under my hand this 17th day of May, 20, 15  
Heather Henline  
General Manager

Printer's Fee: \$ 37.80

Subscribed and sworn to before me this 29 day of May, 20, 15

Mary A Ott-Swick  
Notary Public  
December, 2021

My Commission Expires the 15 day of December, 2021



ADNo: 71562 Customer Number: L04133  
 Customer Name: Company: POTESTA ASSOCIATES  
 Address: 7012 MACCORKLE AVE S  
 City/St/Zip: CHARLESTON , WV 25304  
 Phone: (304) 342-1400 Solicitor: MB  
 Category: 10 Class: 1000 Rate: LE-0 Start: 5-20-2015 Stop: 5-20-2015  
 Lines: 51 Inches: 4.96 Words: 208

Credit Card: Expire:  
 Order Number:  
 Cost: 37.80 Extra Charges: .00 Adjustments: .00  
 Payments: .00 Discount: .00  
 Balance: 37.80

**LEGAL ADVERTISEMENT**

**AIR QUALITY PERMIT NOTICE  
Notice of Application**

Notice is given that Greenfield Cabinetry, LLC (GREENFIELD) has applied to the West Virginia Department of Environmental Protection, Division of Air Quality (DAQ), for a Modification to Regulation 13 Permit R13-2315E. GREENFIELD proposes to increase allowable production by 35 percent and to install an additional spray booth at the facility located at 888 Industrial Park Road in Elkins, County Randolph, West Virginia. The latitude and longitude coordinates are: 38.919841; -79.859161.

The applicant estimates change in the potential to discharge the following Regulated Air Pollutants: PM of 1.98 tons per year (tpy), PM<sub>10</sub> of 1.98 tpy, PM<sub>2.5</sub> of 1.98 tpy, VOC of 47.34 tpy, and total HAPS of 0.12 tpy.

The new booth will be installed in September 2015. Written comments will be received by the West Virginia Department of Environmental Protection, DAQ, 601 57th Street, 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 18 day of May, 2015.

By:  
 Greenfield Cabinetry, LLC  
 Timothy Clontz  
 Plant Manager  
 888 Industrial Park Road  
 Elkins, West Virginia 26241

May 20

**LEGAL ADVERTISEMENT**

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Notice of Application**

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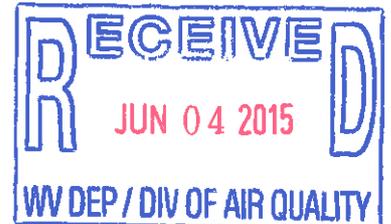
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Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 18 day of May, 2015.

By:  
 Greenfield Cabinetry, LLC  
 Timothy Clontz  
 Plant Manager  
 888 Industrial Park Road  
 Elkins, West Virginia 26241

May 20



**Kessler, Joseph R**

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**From:** Rice, Jennifer L  
**Sent:** Wednesday, May 20, 2015 8:25 AM  
**To:** jonathanriffle@greenfieldcabinetry.com  
**Cc:** Kessler, Joseph R  
**Subject:** WV DAQ Permit Application Status for Greenfield Cabinetry LLC; Elkins

**RE: Application Status  
Greenfield Cabinetry, LLC  
Elkins Facility  
Plant ID No. 083-00104  
Application No. R13-2315F**

Mr. Clontz,

Your application for a modification permit for the Elkins facility was received by this Division on May 18, 2015, and was assigned to Joe Kessler. The following item was not included in the initial application submittal:

**Original affidavit for Class I legal advertisement not submitted.**

*This item is necessary for the assigned permit writer to continue the 30-day completeness review.*

Within 30 days, you should receive a letter from Joe Kessler stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Joe Kessler, at 304-926-0499, extension 1219.

*Jennifer Rice  
WV Dept. of Environmental Protection  
Division of Air Quality*