

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

## Application Review

**Issue Date:** December ##, 2017

**Region:** Washington Regional Office  
**County:** Lenoir  
**NC Facility ID:** 5400187  
**Inspector's Name:** Randall Jones  
**Date of Last Inspection:** 06/15/2017  
**Compliance Code:** 3 / Compliance - inspection

<p style="text-align: center;"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> MasterBrand Cabinets, Inc. - Kinston Plant #9</p> <p><b>Facility Address:</b>  MasterBrand Cabinets, Inc. - Kinston Plant #9  651 Collier-Loftin Road  Kinston, NC 28504</p> <p><b>SIC:</b> 2434 / Wood Kitchen Cabinets  <b>NAICS:</b> 33711 / Wood Kitchen Cabinet and Countertop Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p style="text-align: center;"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b> 15A NCAC 2Q .0513 (Renewal)  <b>NSPS:</b> N/A  <b>NESHAP:</b> N/A  <b>PSD:</b> N/A  <b>PSD Avoidance:</b> N/A  <b>NC Toxics:</b> N/A  <b>112(r):</b> N/A  <b>Other:</b> N/A</p>
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Contact Data			Application Data
<p style="text-align: center;"><b>Facility Contact</b></p> <p>Kolt Jones  EHS Specialist  (252) 559-2549  651 Collier-Loftin Road  Kinston, NC 28504</p>	<p style="text-align: center;"><b>Authorized Contact</b></p> <p>George Lemerise  General Manager  (252) 559-2223  651 Collier Loftin Road  Kinston, NC 28504</p>	<p style="text-align: center;"><b>Technical Contact</b></p> <p>Kolt Jones  EHS Specialist  (252) 559-2549  651 Collier-Loftin Road  Kinston, NC 28504</p>	<p><b>Application Number:</b> 5400187.16A  <b>Date Received:</b> 08/31/2016  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 08804/T11  <b>Existing Permit Issue Date:</b> 08/26/2014  <b>Existing Permit Expiration Date:</b> 05/31/2017</p>

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	---	0.4400	266.61	0.0600	7.01	23.19	9.05 [Xylene (mixed isomers)]
2014	0.3300	1.51	233.97	0.5100	6.42	15.92	6.30 [Xylene (mixed isomers)]
2013	0.0700	0.6600	148.63	0.1500	3.78	9.22	3.80 [Xylene (mixed isomers)]
2012	0.5000	3.18	125.49	1.0000	3.52	6.84	2.44 [Xylene (mixed isomers)]
2011	---	1.60	287.90	---	6.83	18.22	9.23 [Xylene (mixed isomers)]

<p><b>Review Engineer:</b> Richard Simpson</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> December ##, 2017</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue:</b> 08804/T12  <b>Permit Issue Date:</b> December ##, 2017  <b>Permit Expiration Date:</b> November 30, 2022</p>
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**I. Introduction:**

MasterBrand Cabinets, Inc. currently holds Title V Permit No. 08804T11 with an expiration date of May 31, 2017 for manufacturing wood cabinets in Kinston, Lenoir County, North Carolina. The primary purpose of this application is for permit renewal. The renewal application 5400187.16A was received on August 31, 2016, which was at least nine months prior to the expiration date, as required by General Permit Condition 3.K. The application was considered complete on that date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

**II. Description of Facility:**

MasterBrand Cabinets, Inc. (MBCI) receives unfinished, pre-cut wood products (particle board, Hickory, Maple, Oak, Cherry, etc., but no pine) and produces fine cabinets. All their products are purchased by special order. The facility operates typically with one shift (8-11 hrs), 5-6 days per week. Roughly 90% of the time they operate five days per week as opposed to six. They have a cutting area where the pieces are made, and painting/coating areas where the pieces are hung on racks and travel throughout the facility through a series of spray booths and ovens.

**III. History/Background/Application Chronology**

**August 26, 2014** - Permit **08804T11** was submitted to the facility for a minor modification.

**August 31, 2016** - Permit application **5400187.16A** was received for a Title V renewal and a permit acknowledgement was sent to the facility.

**September 13, 2016** - The facility was inspected by WRO engineer Randall Jones and Kim Blumenreich. The facility appeared to operate in compliance with all applicable regulations and permit conditions at the time of the inspection.

**June 15, 2017** – The facility was inspected by WRO engineer Randall Jones and the facility appeared to operate in compliance with all but one of the applicable regulations and permit conditions at the time of the inspection. Generator source (ES-PS) should have been tested within 3 years since the last test.

**September 12-22, 2017** – By phone conversations between facility specialist Kolt Jones and permit engineer Richard Simpson, several updates and suggestions were discussed.

**September 22 – October 16, 2017** – The facility, Washington Regional Office, and Stationary Compliance Section were requested by the Permitting Section to comment on the renewal. Comments were received and included in the permit.

**October ##, 2017** – DRAFT permit sent to public notice and EPA for review prior to issuance. The 30-day public comment period ended **October ##, 2017** with the receipt of no comments. The 45-day EPA review period ended **November ##, 2017** with the receipt of no comments.

#### IV. Permit Modifications/Changes and ESM Discussion

The following table describes all changes made from previous permit 08804T11 as part of the renewal.

Page(s)	Section	Description of Change(s)
Cover and throughout	Throughout	Updated all tables, dates, and permit revision numbers.
Attachment	Insignificant Activities	Deleted source IES6, UV mold coater, since the source has been removed from the facility.
Throughout	Throughout	Corrected the regulatory reference from 2D and 2Q to 02D and 02Q.
Throughout	Throughout	Corrected wording change from assure to ensure.
4	Section 1	Added page number column.
6, 8, and 11	Section 2.1 A.2.a., Section 2.1 B.2.a., Section 2.1 D.2.a.	Added 02D 15A NCAC .0521(d) to the end of the regulation.
13	2.1 D.4.m..	The MACT ZZZZ section for source ES-PS, one diesel-fired emergency and peak shaving generator, was updated to the most recent version from the permit shell. The formatting was updated and the language is virtually the same. The following language was deleted from previous Section 2.1 D.4.m.: “at 100 percent load plus minus 10 percent”.
8	Section 2.1 B.3.b.iii.	Updated CAM regulation from “02D .0515” to “02D .0512”.
26	Section 2.2 B.	Where applicable, change reporting requirement from “Regional Supervisor” to “Regional Office”.
24	Section 2.2 C.	In the previous permit, there were requirements for 15A NCAC 02D .0958: Work Practices for Sources of Volatile Organic Compounds in Section 2.2 4. Per applicability of 15A NCAC 02D .0902 (e) and (f) as amended November 1, 2016, the facility’s regulatory requirement for 15A NCAC 02D .0958 no longer applies to Lenoir County.
10-20	General Conditions	Updated to latest version of DAQ shell version 5.1 08/03/2017.

There were changes made to the Title V Equipment Editor (TVEE) under this permit renewal.

#### V. Regulatory Review/Equipment Changes

The facility is currently subject to the following regulations:

- a. 15A NCAC 02D .0512 “Particulates from Miscellaneous Wood Products Finishing Plants”
- b. 15A NCAC 02D .0516, “Sulfur Dioxide Emissions from Combustion Sources”
- c. 15A NCAC 02D .0521, “Control of Visible Emissions”
- d. 15A NCAC 02D .0530, “Prevention of Significant Deterioration”
- e. 15A NCAC 02D .0614, “Compliance Assurance Monitoring”
- f. 15A NCAC 02D .1111, “Maximum Achievable Control Technology (40 CFR 63, Subpart JJ)”
- g. 15A NCAC 02D .1111, “Maximum Achievable Control Technology (40 CFR 63, Subpart ZZZZ)”
- h. 15A NCAC 02Q .0317, “Avoidance Conditions” (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

An extensive review for each applicable regulation is not included in this document. Per applicability of 15A NCAC 02D .0902 (e) and (f) as amended November 1, 2016, the facility's regulatory requirement for 15A NCAC 02D .0958 no longer applies to Lenoir County. The facility's status with respect to all regulations has not changed. For a discussion of MACT, CAM, and PSD requirements, see Section 6. The permit will be updated to reflect the most current stipulations for all applicable regulations. Detail changes are noted in the above Table of Changes.

#### **VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM**

**NSPS** – The Permittee is not currently subject to any New Source Performance Standards. This administrative amendment does not affect this status.

The 121 brake horsepower diesel-fired emergency fire pump engine (ID No. ES-EFP) was reviewed for applicability of 40 CFR 60 Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Since the engine was constructed in 1989, prior to the earliest applicable date for this engine of April 2006, it is not subject to this rule.

The emergency/peak shaving generator (ID No. ES-PS). This unit is classified as an existing, non-emergency (because of peak shaving operation), compression ignition engine, >500 Hp located at a major source of HAP emissions. Since the generator is non-emergency and can operate anytime, it is not classified as 40 CFR 60 Subpart IIII source.

**NESHAPS/MACT** – The Permittee is currently subject to the Maximum Achievable Control Technology Standards 40 CFR 63 Subpart ZZZZ and JJ for its existing engines and sources. The permit currently includes references to the requirements in each of the paragraphs of this Subpart. This permit renewal does not affect this status.

1. 40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations.
2. 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

**PSD** – The facility is a PSD major facility for VOC emissions. The Permittee is subject to the following Prevention of Significant Deterioration permit conditions:

1. 15A NCAC 2D .0530, Prevention of Significant Deterioration.
2. 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration).

This administrative amendment does not affect this status.

**112(r)** – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal and modification does not affect this status.

**CAM** – 40 CFR 64 requires that a compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The Permittee is currently subject to CAM for the below listed control devices. This administrative amendment does not affect this status.

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
ES-WO1 ES-WO2 ES-WO3	Woodworking operations High volume manufacturing line woodworking operations Saws	BH-1 through BH-8	Eight bagfilters (5,684, 5,684, 5,648, 5,477, 4,350, 6,297, 6,297, and 6,297 square feet of filter area, respectively)

**VII. Facility Wide Air Toxics (State Enforceable Only)**

The Permittee is not currently subject to NC Air Toxics. This administrative amendment does not affect this status.

**VIII. Facility Emissions Review**

There is no change in Title V potential emissions for this renewal. Actual emissions from previous years are listed on Page 1.

**IX. Compliance Status**

Five year compliance history

On February 17, 2014, Randall Jones of the WARO office conducted a full compliance evaluation of the facility. Annual reports were received on February 20, 2014 and were due by January 30, 2014. All reports were reviewed, approved, and the situation was resolved. The facility was issued a Notice of Deficiency in a February 27, 2014 letter.

A CAM report was received May 17, 2017 and was due by April 30, 2017. All reports were reviewed, approved, and the situation was resolved. The facility was issued a Notice of Deficiency in a May 18, 2017 letter.

On June 15, 2017, Randall Jones of the WARO office conducted a full compliance evaluation of the facility. For peak shaving generator ES-PS, a performance test is due every 3 years per MACT ZZZZ. The test was not conducted within the appropriate period due to mechanical problems with the generator. The facility was issued a Notice of Violation in a June 30, 2017 letter.

**X. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. There is no affected state/local program within 50 miles of the facility.

EPA's 45 Day Review period

Ms. Heather Ceron (U.S. EPA, Region IV) was provided a PROPOSED permit for review on Octoberr ##, 2017. EPA 45-day review period ended on January 26, 2017. No comments were offered or received.

Public Notice

The 30-day public notice of the proposed permit was posted on the NCDAQ website on October ##, 2017. No comments were offered or received.

**XI. Other Regulatory Considerations**

- A P.E. seal is NOT required for this application.
- A consistency determination is NOT required for this renewal.
- An application fee is NOT required for this renewal.
- Lenoir County has not triggered increment tracking under PSD for any pollutants, so no tracking is required.

**XII. Recommendations**

The permit renewal and modification applications for MasterBrand Cabinets, Inc. in Kinston, Lenoir County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 08804T12.