

OPERATING PERMIT - TECHNICAL SUMMARY
SITE OPERATING PERMIT - SOP
MINOR REVISION

Permit #: **O1080**

Company: **B J Tidwell Industries Inc**

Project #: **7097**

Site: **Cardell Kitchen & Bath Cabinetry San Antonio Plant**

Account #: **BG-0395-U**

Application Area: **Cardell Kitchen & Bath Cabinetry San Antonio Plant**

Regulated Entity
#: **RN100221910**

Customer #: **CN600131056**

Region: **13**

County: **Bexar**

SIC Code: **2434**

SIC Name: **Wood Kitchen Cabinets**

Permit Reviewer: **Joseph A. Janecka, P.E.**

PERMIT INFORMATION

Was confidential information submitted?

No

Are any permits being reviewed for New Source Review action?

No

Is the application subject to acid rain permitting?

No

SITE INFORMATION

Physical Location: 3215 Pan Am Expressway

Nearest City: San Antonio

Major Pollutants: VOC, HAPS

Additional FOPs: None

PROJECT SUMMARY

B. J. Tidwell has submitted an application for a streamlined minor revision to their Site Operating Permit O1080. The revision reflects a new process line constructed at the site.

REVISION DESCRIPTION

A new cabinet coatings process line was constructed from new equipment and a rearranging of some existing equipment. This new process line and its applicable requirements will be codified in the existing SOP by this revision. Also, a change to the requirements was made on the existing PRONEW line based on a change to method of determining compliance.

PROCESS DESCRIPTION

The process line, consisting of several spray booths and coating operations, coats the various surfaces of kitchen and bath cabinets made at the plant. Booth exhaust and other hood ducts draw the overspray and resulting VOC emissions to a catalytic oxidizer.

TECHNICAL REVIEW

The new process line is subject to 40 CFR Part 63, Subpart JJ. Attributes of this new process line (PRONEW05) result in compliance with this MACT by using compliant coatings.

While reviewing this new process, a quick look at one of the existing process lines (PRONEW) led to a change in MACT JJ requirements in this project. This was due to the determination that: although there was a control device present for the NSR permit, it was not being used for purposes of complying with MACT JJ. Therefore, the attributes for MACT JJ reflecting the presence of a control device (for purposes of MACT JJ compliance) was deleted, and requirements were adjusted to reflect this change.

The draft permit was submitted to the applicant on (date): March 10, 2005
Did the applicant comment on the draft permit? Wanted to change the method of compliance determination for PRONEW: Changed compliance technique from combination to compliant finishes.
If yes briefly describe the comments and the changes made to the draft permit (if applicable). Made the necessary changes to the PRONEW citations.

MANUAL CHANGES TO PERMIT

None

EMISSIONS BANKING AND TRADING PROVISIONS (Pursuant to 30 TAC Chapter 101, Subchapter H)

Is the site/permit area located in the Houston/Galveston ozone non-attainment area (as defined in 30 TAC Chapter 101, §101.1): No

COMPLIANCE ASSURANCE MONITORING (CAM)/ PERIODIC MONITORING (PM)

A review of the permit added additional CAM/PM for the following emission sources subject to the identified regulations: The MACT requirement was the only applicable requirement reviewed under this revision, and thus had sufficient monitoring and did not require periodic monitoring and was exempt from CAM..

STATEMENT OF BASIS

A Statement of Basis sets forth the legal and factual basis for the permit conditions.
The Statement of Basis was prepared on: 04/27/2005
The Statement of Basis GroupWise Document #(OPDP Database): 38243

PUBLIC ANNOUNCEMENT/EPA REVIEW

Posting Date: 05/10/2005

Did the public comment on the working draft permit? No

Beginning of the EPA Review Period: 05/10/2005

Did the EPA comment on the proposed permit? No

Discuss any changes to the Applicable Requirements that are not in agreement with the results generated by the RRT, or changes to the Terms and Conditions generated by the IMS in the 'Manual Changes to Permit Section' of the Technical Summary. **DELETE this sentence when EPA Review is completed.**

PUBLIC PETITION PERIOD/FINAL STATE ACTION

Effective permit issuance date:

Joseph A. Janecka, P.E.
Permit Reviewer
Operating Permits Section
Air Permits Division

Javier Maldonado, P.E.
Team Leader
Operating Permits Section
Air Permits Division

ATTACHMENTS

IMS Tracking Elements
Communication Log
Administrative Data

IMS TRACKING ELEMENTS

Project Number: 7097
Permit Number: O01080

Project Type: STREAMLINED REVISION
Permit Type: SOP

Company: B J TIDWELL INDUSTRIES INC
Site: CARDELL KITCHEN & BATH CABINETRY SAN ANTONIO PLANT
Account Number: BG-0395-U
Regulated Entity RN: RN100221910
SIC: 2434

<u>Assign Date</u>	<u>Last Name</u>	<u>First Name</u>	<u>Project Role</u>	<u>Phone Number</u>
03/01/2005	JANECKA	JOSEPH	REVIEW ENG	(512) 239-1353

<u>Stage</u>	<u>Start Date</u>	<u>Complete Date</u>	<u>Tracking Element</u>	<u>Type</u>
IS	02/15/2005		DATE PAR RECEIVED PROJECT	STANDARD EVENT
IS	02/15/2005		DATE INITIAL INFO/APPL/REQUEST RECEIVED BY TCEQ	STANDARD EVENT
IS	02/16/2005		DATE PAR TRANSFERRED PROJECT TO APD	STANDARD EVENT
TR	03/01/2005		DATE PROJECT RECEIVED BY ENGINEER	STANDARD EVENT
TR	03/02/2005	05/05/2005	TECHNICAL REVIEW PERIOD	STANDARD ACTIVITY
TR	03/10/2005	04/24/2005	WORKING DRAFT PERMIT REVIEW BY APPLICANT	STANDARD ACTIVITY
PA	05/05/2005	05/05/2005	SECTION MNGR REVIEW OF NPPPA PACKAGE	STANDARD ACTIVITY
PA	05/05/2005	05/05/2005	TEAM LEADER REVIEW OF NPPPA PACKAGE	STANDARD ACTIVITY
PA	05/10/2005	06/10/2005	PUBLIC ANNOUNCEMENT PERIOD	STANDARD ACTIVITY
EPA	05/10/2005	06/24/2005	EPA REVIEW PERIOD	STANDARD ACTIVITY

COMMUNICATION LOG

Company Name	Application Area	Air Account Number	Regulated Entity Number	IMS Project Number
B J Tidwell Industries Inc	Cardell Kitchen & Bath Cabinetry San Antonio Plant	BG-0395-U	RN100221910	7097

Contact	Title	Phone or E-Mail	Date	Notes
Ron Grantham	Consultant	210-698-9333	03/03/05	discussed control attributes for surface coating operations and how it relates to the MACT, resulting in application updates.

Note: e-mails relevant to the review of this project have been printed and included in the permit file.

ADMINISTRATIVE DATA

Responsible Official: Art Torres
General Manager
B J Tidwell Industries Inc
3215 N Pan Am Expressway
San Antonio, Tx 78219

Duly Authorized Rep: There is no Duly Authorized Representative

Technical Contact: Ron Grantham, P.E.
Consultant
Arkwood Engineering, Inc.
17825 Babcock Road
San Antonio, Tx 78255
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Permit Consultant: (see Technical contact above)