

Buddy Garcia, *Chairman*
Larry R. Soward, *Commissioner*
Bryan W. Shaw, Ph.D., *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 16, 2009

MR MIKE CHAMBERS
PRESIDENT
NATIONAL BUSINESS SERVICES INC
1601 MAGOFFIN ST
EL PASO TX 79901

RECEIVED
JAN 27 2009
TCEQ
CENTRAL FILE ROOM

Permit by Rule Registration Number: 81263
Location/City/County: 1601 Magoffin Avenue, El Paso, El Paso County
Project Description/Unit: National Business Services
Regulated Entity Number: RN101467116
Customer Reference Number: CN603155979
New or Existing Site: Existing
Affected Permit (if applicable): None
Renewal Date (if applicable): None

NBS, Inc. has registered the emissions associated with the National Business Services surface coating and wood refinishing operations under Title 30 Texas Administrative Code §§ 106.231 and 106.433.

For rule information see www.tceq.state.tx.us/permitting/air/nav/numerical_index.html.

No planned MSS emissions have been represented or reviewed for this registration. The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

All analytical data generated by a mobile or stationary laboratory to support the compliance with an air permit must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory. For additional information regarding the laboratory accreditation program, please see the following website which includes the accreditation and exemption information:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

This registration is taken under the authority delegated by the Executive Director of the TCEQ. If you have questions, please contact Ms. Molly Braddock at (512) 239-6595.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne M. Inman".

Anne M. Inman, P.E., Manager
Rule Registrations Section
Air Permits Division

Represented Site-wide Emissions:

VOCs	8.46 tpy
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cc: Air Quality Manager, Environmental Services, City of El Paso, El Paso
Air Section Manager, Region 6 - El Paso

Project Number: 143170

TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	81263	Company Name:	NBS Inc	APD Reviewer:	Ms. Molly Braddock
Project No.:	143170	Unit Name:	National Business Services	PBR No(s).:	106.231, 106.433

GENERAL INFORMATION					
Regulated Entity No.:	RN101467116	Project Type:	Permit by Rule Application		
Customer Reference No.:	CN603155979	Date Received by TCEQ:	December 15, 2008		
Account No.:	None	Date Received by Reviewer:	December 17, 2008		
City/County:	El Paso, El Paso County	Physical Location:	1601 Magoffin Ave		

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mike Chambers President	Phone No.:	(915) 544-1271	Email:	None provided.
		Fax No.:	(915) 544-2335		
Technical Contact/ Consultant Name and Title:	Same as above.	Phone No.:	Same as above.	Email:	Same as above.
		Fax No.:			

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		X	No confidential information submitted.
Are there affected NSR or Title V permits for the project?		X	This is an existing site with no previously issued NSR or Title V permits.
Is each PBR > 25/250 tpy?		X	
Are PBR sitewide emissions > 25/250 tpy?		X	
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required?		X	This site is not one of the 28 named sources and emissions are below the federal significance as major source levels; therefore, PSD and NA review and netting are not required.
Do NSPS, NESHAP, or MACT standards apply to this registration?		X	None of the standards apply.
Does NOx Cap and Trade apply to this registration?		X	Site is not located in the Houston/Galveston area.
Is the facility in compliance with all other applicable rules and regulations?	X		Applicant represents they are in compliance with all applicable rules and regulations, including 30 TAC Chapter §§ 115.420-429.

DESCRIBE OVERALL PROCESS AT THE SITE

NBS, Inc. is registering the manufacturing, refinishing, and restoring wood products operations located in El Paso County under Permit by Rule 106.231. The company is also proposing changes to their representation of VOC emissions associated with their surface coating operations under PBR 106.433.

DESCRIBE PROJECT AND INVOLVED PROCESS

NBS, Inc. has submitted a Form PI-7 and supporting documentation to register the National Business Services facility. The company sells modular office systems, which are cubicles made up of fabric covered panels, metal cabinets and overheads, and plastic laminate particle board work surfaces. Prefabricated furniture is remanufactured and reconditioned at this site before being sold.

This registration revision proposes to authorize changes to the representation for the previously registered paint booth. In May 2008, the company transitioned to water based paint, resulting in VOC emission reductions. No physical changes to the booth are represented. Paint VOC emission calculations are based on 2340 operating hours, 1.84 lb/gal VOC, and a usage rate of 5 gallons per day. Thinner is used for clean-up purposes only. Thinner (xylene) VOC emission calculations are based on a total usage rate of 550 gallons per year and 7.17 lb/gal VOC.

The company also proposes to authorize the addition of an enclosed glue application booth at the facility. Adhesive is applied to particle board with a red contact adhesive and plastic laminate is then adhered to that surface. Adhesive VOC emission calculations are based on 1820 operating hours, 5.56 lb/gal VOC, and a usage rate of 6 gallons per day.

All emission values differ from those originally submitted by the company; however, they are more reflective of the processes conducted at the site. No planned MSS emissions have been represented or reviewed for this registration and none will be authorized by this registration.

TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

NBS, Inc. represents that all the general requirements of 30 TAC § 106.4 and the specific requirements of 30 TAC §§ 106.231 and 106.433 have been met.

§106.231 Manufacturing, Refinishing, and Restoring Wood Products

- (1) A pneumatic sawdust collections system is not used. All sawdust is swept up, bagged, and sold. There no visible emissions.
- (2) Sawdust is collected and disposed of without visible emissions leaving the property.
- (3) Total coatings, solvents, and stripping agents will not exceed 6 gallons a day, therefore Sections (a) - (b) do not apply.
- (4) Purchase receipts for coatings are kept on site for the most recent 24 months to demonstrate that the total emission do not exceed 25 tons per year in any consecutive 12 months.

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§106.433 Surface Coating Facility

- (1) Metalizing is not being performed at this site.
- (2) Good housekeeping procedures will be practiced including:
 - (a) Spills are cleaned up immediately.
 - (b) Booth exhausts or work area exhaust fans will be operated when cleaning spray guns and other equipment.
 - (c) All new and used coatings and solvents will be stored in closed containers. All waste coatings and solvents shall be removed from the site by an authorized disposal service or disposed of at a permitted on-site waste management facility.
- (3) Non-electric drying or curing ovens are not being used.
- (4) There are no add-on controls used to reduce VOC emissions.
 - (a) Total annual VOC emission rate for all surface coating and/or stripping facilities at this site is 4.12 tpy VOC.
 - (b) Total hourly VOC emission rate for all surface coating and/or stripping facilities at this site will not exceed 30 lb/hr VOC and 5 lb/hr exempt solvents.
 - (c) Total maximum hourly emission rate of VOC is more than 0.25 lb/hr. Therefore, paragraphs (5)-(9) apply.
- (5) The opacity of visible emissions from new and existing surface coating facilities will not exceed 5.0%.
- (6) Surface coating operations are performed in an enclosed area. Therefore, Sections (a)-(c) must be met.
 - (a) The maximum hourly VOC emission rate averaged over a five-hour period will not exceed 6 lb/hr and the maximum weekly VOC emission rate will not exceed 500 lb/wk.
 - (b) The minimum face velocity at the intake opening of the paint booth is 100 ft/min. The building height is 46 feet and the stack height is 54 feet, which meets the 1.5 times building height requirement per Jon Williams of TCEQ Region 6 El Paso. A damper will be used for rain protection and will not obstruct the vertical flow of the stack.
 - (c) A dry filter with a 98.65% efficiency rate will be used. The face velocity at the filter is 150 ft/min which meets the requirements and the filters will be replaced based on manufacturer's specifications.
- (7) NA. Surface coating operations are performed in a completely enclosed work area or booth.
- (8) Records are maintained at the plant site for the most recent 24 months. Records include:
 - (a) Material Safety Data Sheets for all coating materials and solvents.
 - (b) Data of daily coatings and solvent use and the actual hours of operation of each coating and stripping operation.
 - (c) A summary report for each month that represents actual hours of operation and emissions from each operation.
 - (d) Examples of the method of data reduction.
- (9) A Form PI-7 was submitted on December 15, 2008.

COMMUNICATION LOG

Date	Time	Name/Company	Subject of Communication
December 19, 2008	9:00 AM	Mr. Mike Chambers/NBS, Inc.	Reviewer called Mr. Chambers to request more information in order to complete the technical review. He referred me to Mr. Humberto Belmont and stated that he would have him return my call.
December 19, 2008	10:15 AM	Mr. Humberto Belmont/NBS, Inc.	Mr. Belmont called to discuss my request for additional information. Reviewer explained that the 106.433 checklist contains information for both an enclosed and non-enclosed surface coating operation. Reviewer also requested a process description, operating schedule, MSDS for the glue used in surface coating, and calculations for lb/hr VOC and tpy of VOC. Mr. Belmont referred the reviewer to Mr. Danny Carrasco, the site investigator for the City of El Paso. He stated that Mr. Carrasco had been to the site recently and would be able to explain whether the glue booth meets the requirements for enclosed or non-enclosed operations.
December 19, 2008	12:15 PM	Mr. Danny Carrasco/City of El Paso	Reviewer called Mr. Carrasco to discuss the NBS, Inc. facility. He stated that the face velocity at the intake opening of the work area was greater than 100ft/min, so the booth met the requirement of an enclosed facility. Reviewer discussed the stack height requirements and stated that the checklist submitted by the company indicated that the facility does not meet the rule. He stated that, visually, the stack height appeared to be 1.5 times the height of the building, but that he did not actually measure it.

TECHNICAL REVIEW: AIR PERMIT BY RULE

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December 19, 2008	2:01 PM	Mr. Humberto Belmont/NBS, Inc.	Reviewer emailed Mr. Belmont to inform him that based on the information provided on the 106.433 checklist, the company does not currently meet the requirements for either type of facility. For an enclosed operation, the checklist states that the building height is 50ft and the stack height is 60ft, which does not meet the rule as the stack height is not 1.5 times the height of the building. For a non-enclosed operation, the checklist states that the distance from the source of emissions to the nearest property line is 28ft, which does not meet the requirement of 50ft. Reviewer asked Mr. Belmont to determine if any of the information on the checklist was provided in error or if the company would be willing to raise the stack height or relocate the booth to meet the requirements. Reviewer asked that he provide this information by December 22, 2008. Reviewer stated that after this issue is resolved, then the company will need to submit a process description, operating schedule, MSDS for the glue used in surface coating, total glue usage in gallons per day, and calculations for lb/hr VOC and tpy of VOC.
December 30, 2008	9:40 AM	Mr. Humberto Belmont/NBS, Inc.	Reviewer left a voice mail message for Mr. Belmont asking him to contact me by close of business today to discuss the type of facility being claimed.
December 31, 2008	10:30 AM	Mr. Mike Chambers/NBS, Inc.	Reviewer called Mr. Chambers to discuss the requirements for authorization of this PBR registration. He stated that, based on the advice of the City of El Paso, the company recently increased the stack height to meet the requirements of an enclosed surface coating booth; however, he could not confirm the exact height of the building or stack. He stated that Mr. Belmont was out of the office for the holidays, but that he would be back on Monday, January 5.
January 5, 2009	10:50 AM	Mr. Humberto Belmont/NBS, Inc.	Reviewer called and left message for Mr. Belmont. Reviewer asked that he respond by close of business today.
January 5, 2009	12:00 PM	Mr. Howard Uhal/TCEQ	Reviewer spoke with Mr. Uhal to discuss the project. Mr. Uhal recommended speaking with Mr. Coldiron to determine whether PBR 106.231 alone would cover the glue application process conducted at this site.
January 5, 2009	2:00 PM	Mr. Mike Coldiron/TCEQ	Reviewer spoke with Mr. Coldiron to determine if PBR 106.433 is required for the type of glue application process being conducted at this site. He reviewed the project and determined that PBR 106.231 would cover the application of an adhesive to wood products, as well as laminate. However, other materials such as plastic and metal would not be covered. He stated that more information about the materials being used in the glue application process would be necessary to confirm that PBR 106.231 could be used to authorize the facility.
January 5, 2009	2:45 PM	Mr. Humberto Belmont/NBS, Inc.	Mr. Belmont provided a process description, MSDS for the glue, and a photo of the glue booth stack via email. The email stated, "Our building is a three story building we are the tallest building in the area. The building height is only 46 ft from ground level to the roof. The exhaust stack is 8 ft taller than the building. (Picture attached). Process description: We sell modular office systems (cubicles: fabric covered panels, metal cabinets & overheads and plastic laminate particle board work surfaces). The only thing we use the glue for, is to glue the plastic laminate to the particle board with a red contact adhesive (MSD sheets for the glue Attached). All orders are custom made, which means we only glue when an order is in, this varies daily and by the size since all orders are different."
January 5, 2009	3:50 PM	Mr. Mike Coldiron/TCEQ	Reviewer emailed Mr. Coldiron to determine whether PBR 106.231 covers the applicant's operations, as the company specifically described the laminate as "plastic".
January 6, 2009	9:51 AM	Mr. Mike Coldiron/TCEQ	Mr. Coldiron responded via email and stated, "I think the use of 106.231 is appropriate in this case. They are making a wood work surface and just covering it with a plastic laminate (which is made from resin impregnated paper). The adhesive is the source of emissions (just as any stain, sealer or topcoat would be) and the plastic laminate has no emissions of its own."
January 6, 2009		Mr. Howard Uhal/TCEQ Mr. Danny Carrasco/City of El Paso	Mr. Uhal spoke with Mr. Carrasco regarding his previous site visit in September of 2008. Mr. Carrasco confirmed that two separate booths (paint and adhesive) are located on the second floor of a two story building. He stated that the company makes prefabricated furniture. The glue is applied to the particle board and then the laminate is applied to the adhesive. He recommended contacting Mr. Karl Rimkus with the TCEQ El Paso Region, who served as the liaison between the TCEQ Regional Office and the City of El Paso's local program.
January 6, 2008		Mr. Howard Uhal/TCEQ Mr. Karl Rimkus/TCEQ Region 6 - El Paso	Mr. Uhal contacted Mr. Rimkus to discuss his knowledge of this facility. He referred Mr. Uhal to Mr. John Williams, TCEQ Air Program Coordinator for the El Paso Region.

TECHNICAL REVIEW: AIR PERMIT BY RULE

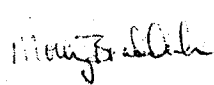

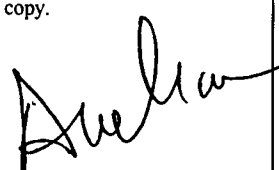
Permit No.:	81263	Company Name:	NBS Inc	APD Reviewer:	Ms. Molly Braddock
Project No.:	143170	Unit Name:	National Business Services	PBR No(s).:	106.231, 106.433

January 6, 2009		Mr. Howard Uhal/TCEQ Mr. Jon Williams/ TCEQ Region 6 - El Paso	Mr. Uhal spoke with Mr. Williams about his site visit at this facility. Mr. Williams stated that he would visit the site again on January 8, 2009 to conduct stack height measurements.
January 7, 2008	5:06 PM	Mr. Humberto Belmont/NBS, Inc.	Reviewer emailed Mr. Belmont to request additional information. Reviewer requested the following: <ul style="list-style-type: none"> • Operating schedule for each booth • Total daily usage of paint and adhesive in gallons • Total annual VOC emissions (tpy) for paint and adhesive • Calculations for annual VOC emissions • Name/Brand and specific type of paint used • Manufacturer's filter specs for each booth Reviewer referred the company to the TCEQ El Paso Regional Small Business and Local Government Assistance program if assistance is needed in providing VOC emission calculations.
January 8, 2009	1:07 PM	Mr. Howard Uhal/TCEQ Mr. Jon Williams/ TCEQ Region 6 - El Paso	Mr. Williams provided stack height measurements and photos of each stack via email. He and Danny Carrasco traveled to the site and used a laser range finder to measure both stacks. Both are above the 45 ft requirement. He used the glue booth stack measurement of 51.9 feet and the two photographs to determine that the height of the paint booth stack is approximately 54 feet.
January 9, 2009	12:20 PM	Mr. Howard Uhal/TCEQ Mr. Jon Williams/ TCEQ Region 6 - El Paso	Mr. Uhal spoke with Mr. Williams to clarify the findings of his site visit. Mr. Williams confirmed the height of the building is 30ft. He stated that 1.5 times the height of the building is 45ft and that both of the stacks are at least 45ft, thus meeting the stack height requirement.
January 14, 2009	4:30 PM	Mr. Humberto Belmont/NBS, Inc.	Reviewer called and left a message for Mr. Belmont to discuss how to proceed. Reviewer followed up with an email to determine if he plans to submit any of the requested information. The deficiency process was also discussed as an option if the applicant cannot provide sufficient information to authorize this registration.
January 14, 2009	7:51 PM	Mr. Humberto Belmont/NBS, Inc.	Mr. Belmont submitted the requested information via email.

ESTIMATED EMISSIONS													
EPN / Emission Source	Specific VOC or Other Pollutants	VOC		NOx		CO		PM ₁₀		SO ₂		Other	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
Wood Manufacturing	1820 hrs/yr	4.77	4.34										
Paint Booth	2340 hrs/yr	1.84	2.15										
Thinner (Clean-up)*		-	1.97										
TOTAL EMISSIONS (TPY):			8.46										
MAXIMUM OPERATING SCHEDULE:		Hours/Day		Days/Week		Weeks/Year		Hours/Year					

*NOTE: Emissions from clean-up have been calculated based on worst case: 100% VOC (xylene) used.

SITE REVIEW / DISTANCE LIMIT	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		X	Site review not required by rule.	January 5, 2008	Ms. Molly Braddock
PBR Distance Limits Met?		N/A	Applicant represents the facility is located 25ft from the nearest property line and 40ft from the nearest off-site receptor.	January 5, 2008	Ms. Molly Braddock

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:			See hard copy. 
PRINTED NAME:	Ms. Molly Braddock	Ms. Patricia Moden	Ms. Anne M. Inman, P.E., Manager
DATE:	January 15, 2009	January 15, 2009	January 16, 2009

BASIS OF PROJECT POINTS	POINTS
Base Points: 106.433	1.5

~~1.2~~ 12.0

01/15/2009 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 143170 PERMIT#: 81283 STATUS: PENDING DISP CODE: ^c
 RECEIVED: 12/15/2008 PROJTYPE: REVISION AUTHTYPE: PBR ISSUED DT: ~~1/15/09~~

RENEWAL:
 PROJECT ADMIN NAME: ENCLOSED SURFACE COATING REFURBISH MODULAR FURNITURE
 PROJECT TECH NAME: NATIONAL BUSINESS SERVICES

*12.0
Patricia*

Assigned Team: RULE REG SECTION

STAFF ASSIGNED TO PROJECT:
 SUNIGA , RICHARD - REVIEWR1_2 - AP INITIAL REVIEW
 BRADDOCK , MOLLY - REVIEW ENG - RR TEAM

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)
 ISSUED TO: NBS INC
 COMPANY NAME: NBS INC
 CUSTOMER REFERENCE NUMBER: CN603155979

REGULATED ENTITY/SITE INFORMATION
 REGULATED ENTITY NUMBER: RN101467116 ACCOUNT:
 SITE NAME: NATIONAL BUSINESS SERVICES

REGULATED ENTITY LOCATION: 1601 MAGOFFIN AVE
 REGION 06 - EL PASO NEAR CITY: EL PASO COUNTY: EL PASO

CONTACT DATA

CONTACT NAME: MR MIKE CHAMBERS CONTACT ROLE: RESPONSIBLE OFFICIAL
 JOB TITLE: PRESIDENT ORGANIZATION: NATIONAL BUSINESS SERVICES INC
 MAILING ADDRESS: 1601 MAGOFFIN ST , EL PASO, TX, 79901-0000
 PHONE: (915) 544-1271 Ext: 0
 FAX: (915) 544-2335 Ext: 0

FEE:

Reference	Fee Receipt Number	Amount	Fee Receipt Date	Fee Payment Type
61889		100.00		ePAY

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	12/15/2008	
ADMIN DEFICIENCY CYCLE	12/16/2008	12/16/2008
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	12/16/2008	
CENTRAL REGISTRY UPDATED	12/16/2008	12/16/2008
PROJECT RECEIVED BY ENGINEER (DATE)	12/17/2008	
DEFICIENCY CYCLE	12/19/2008	01/15/2009
ENGINEER INITIAL REVIEW COMPLETED (DATE)	12/19/2008	
PEER / MANAGER REVIEW PERIOD	01/15/2009	01/16/2009

UNIT TYPES:

Project Unit Type:	Industry Group	Industry Type	Source Type	Control/BACT Type	Request	Authorization
	COATINGS	PAINTING				
	CONSTRUCTION	WOOD: PARTICLEBOARD				

PROJECT RULES:

Rule Desc	Request Type	On Application	Approve
106.231 MANUFACTURING, REFINISHING, AND RESTORING -	ADD	Y	APPROVE
106.433 SURFACE COAT FACILITY -	ADD	Y	APPROVE

PERMIT RULES:

Rule Desc	Start Date	End Date
106.433	04/11/2007	