

Permit by Rule (PBR) Registration Technical Review

Company:	Leedo Manufacturing Co., L.P.	Registration No.:	166529
Nearest City:	El Campo	Project No.:	380970
County:	Wharton	Project Type:	Revision
Project Reviewer:	John Ma	Regulated Entity No.:	RN100222157
Unit Name:	Leedo Manufacturing El Campo Plant	Customer Reference No.:	CN600254106
PBR No(s).:	106.231	Project Received Date:	October 2, 2024
Physical Location:	600 Sam Bishkin Rd		

Project Overview / Process Description

Leedo Manufacturing Co., LP (Leedo) has submitted this certified project to authorize changes to their existing operation under 106.231. Leedo will authorize revised glue emissions. There will be no other changes authorized by this project. Additional woodworking operations at the site which are separate from these facilities are authorized under historical standard exemption (SE 105 – Registration Nos. 112021 and 112022).

The facility produces wood cabinets for domestic and commercial applications. Raw wood is sawed, sanded, notched, and shaped into cabinet parts. The parts are then sent to the glue booth where they are glued together. The glue is applied using HVLP spray guns. The assembled cabinets are wiped down at two wipe down stations. Emissions from the raw wood processes are routed to an internal dust collector and an external dust collector for control.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 723586 / 582EA000627514
Is this registration certified?	Yes
Is planned MSS included in the registration?	No
Are there affected NSR or Title V authorizations for the project?	No
<i>NSR and/or Title V authorizations:</i>	
Are there any upstream or downstream affects associated with this registration?	No
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements? Sitewide emissions meet 106.4 limits.	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility in compliance with all other applicable rules and regulations?	Yes

Federal Applicability

Does this project trigger a PSD or Nonattainment review?	No
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	NA
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	No

Permit by Rule Requirements - Compliance Demonstrations

PBR 106.231 Manufacturing, Refinishing, And Restoring Wood Products

Facilities include manually operated equipment, used for manufacturing, refinishing, and/or restoring wood products.

(1) A pneumatic sawdust collection system is used and is followed by a filter with no visible emissions.

(2) Waste materials are stored and disposed of properly with no visible emissions leaving the property.

(3) Total coatings, solvents, and stripping agents > 6 gallons/day:

(A) The application area is exhausted using forced air through a stack with an unobstructed vertical discharge above the peak of the roof line

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- (B) Spraying application is vented through a filter system with a minimum particulate removal efficiency of 95% **[98.81%]**.
(4) Company will maintain records as appropriate.

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: **October 14, 2024**
Site rating / classification: **0.00 / High** Company rating / classification: **10.42 / Satisfactory**
Has any action occurred on the basis of the compliance history or rating? **No**
Did the Regional Office provide site approval and confirm distances? **NA**

Emission Summary

ESTIMATED EMISSIONS																
EPN / Emission Source	VOC		NO _x		CO		PM		PM ₁₀		PM _{2.5}		SO ₂		Exempt Solvent	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Revised Emissions																
GLUE-1 / Glue Booth 1	0.20	0.51	--	--	--	--	<0.01	0.01	<0.01	0.01	<0.01	0.01	--	--	0.07	0.17
Currently Authorized / Existing Emissions																
C-1 / External Dust Collector	--	--	--	--	--	--	0.96	2.51	0.96	2.51	0.96	2.51	--	--	--	--
IDC-1 / Internal Dust Collector	--	--	--	--	--	--	0.08	0.22	0.08	0.22	0.08	0.22	--	--	--	--
HC-1 / Cabinet Wipedown 1	0.98	0.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--
HC-2 / Cabinet Wipedown 2	0.98	0.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TOTAL EMISSIONS (TPY):		1.24		--		--		2.74		2.74		2.74		--		0.17
MAXIMUM OPERATING SCHEDULE:			Gallons/Year		EPN GLUE-1 – 4,416 (Glue) and 53 (Acetone) EPNs HC-1 and HC-2 – 1,500 Total (Wipedown Chemical)								Hours/Year		5,250	

Mr. John Ma
Permit Reviewer
Rule Registration Section

October 14, 2024
Date

Michael Partee, Manager
Rule Registrations Section
Air Permits Division

October 15, 2024
Date