

State of Utah

SPENCER J. COX Governor

DEIDRE HENDERSON Lieutenant Governor Department of Environmental Quality

> Kimberly D. Shelley Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director

DAQE-AN105580010-25

February 27, 2025

Allen Garcia Cabinetry By Karman P.O. Box 57086 Murray, UT 84157 agarcia@cabinetrybykarman.com

Dear Mr. Garcia:

Re: Approval Order: Administrative Amendment to Approval Order DAQE-AN105580009-18 to Reduce the VOC and HAP Emissions from Cabinetry Manufacturing Facility Project Number: N105580010

The attached Approval Order (AO) is issued pursuant to the Notice of Intent (NOI) received on June 25, 2024. Cabinetry By Karman must comply with the requirements of this AO, all applicable state requirements (R307), and Federal Standards.

The project engineer for this action is **Mr. Tim DeJulis**, who can be contacted at (385) 306-6523 or tdejulis@utah.gov. Future correspondence on this AO should include the engineer's name as well as the DAQE number shown on the upper right-hand corner of this letter.

Sincerely,

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Bryce C. Bird Director

BCB:TD:jg

cc: Salt Lake County Health Department

STATE OF UTAH Department of Environmental Quality Division of Air Quality

APPROVAL ORDER DAQE-AN105580010-25 Administrative Amendment to Approval Order DAQE-AN105580009-18 to Reduce the VOC and HAP Emissions from Cabinetry Manufacturing Facility

Prepared By Mr. Tim DeJulis, Engineer (385) 306-6523 tdejulis@utah.gov

Issued to Cabinetry By Karman - Cabinet Manufacturing Facility

> Issued On February 27, 2025

> > **Issued By**

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Bryce C. Bird Director Division of Air Quality

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name Cabinetry By Karman

Mailing Address

Murrav, UT 84157

P.O. Box 57086

Source Name Cabinetry By Karman - Cabinet Manufacturing Facility

Physical Address 6000 South Stratler Street Murray, UT 84157

Source Contact Name: Allen Garcia Phone: (801) 281-6400 Email: agarcia@cabinetrybykarman.com UTM Coordinates

423,750 m Easting 4,499,150 m Northing Datum NAD83 UTM Zone 12

SIC code 2511 (Wood Household Furniture, Except Upholstered)

SOURCE INFORMATION

General Description

Cabinetry By Karman (CBC), located in Murray, Salt Lake County, produces custom wood furniture items for use by third parties. Custom designs are created using wood. PM emissions are controlled by the use of a cyclone/baghouse, venting internally. The wood items are painted in six (6) paint booths and dried in two (2) drying ovens.

<u>NSR Classification</u> Administrative Amendment

Source Classification Located in Northern Wasatch Front O3 NAA, Salt Lake City UT PM_{2.5} NAA, Salt Lake County SO₂ NAA Salt Lake County Airs Source Size: SM

Applicable Federal Standards None

Project Description

CBC requests a modification to AO DAQE-AN105580009-18, dated September 25, 2018, to reduce the VOC and HAP emission rates. The VOC emission rate will change from 69.0 tpy to 49.0 tpy, and the HAP emission rate will change from 18.75 tpy to 12.22 tpy. No other changes to the existing process will take place.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
Carbon Monoxide	0	0.50
Nitrogen Oxides	0	1.49
Particulate Matter - PM ₁₀	0	0.18
Particulate Matter - PM _{2.5}	0	0.18
Sulfur Dioxide	0	0.01
Volatile Organic Compounds	-20	49.00

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Ethyl Benzene (CAS #100414)		3100
Ethylene Glycol (CAS #107211)	-20	40
Formaldehyde (CAS #50000)	-72	200
Glycol Ethers (CAS #EDF109)	-106	220
Methanol (CAS #67561)	-26	20
Methyl Isobutyl Ketone (Hexone) (CAS #108101)	198	200
Toluene (CAS #108883)	-2966	7260
Xylenes (Isomers And Mixture) (CAS #1330207)	-5494	13400
	Change (TPY)	Total (TPY)
Total HAPs	-4.34	12.22

SECTION I: GENERAL PROVISIONS

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]

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1.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

SECTION II: PERMITTED EQUIPMENT

II.A <u>THE APPROVED EQUIPMENT</u>

II.A.1	Cabinetry By Karman
II.A.2	One (1) Multi-Component Spray Coating System Reciprocating spray machine and a multi-level electric/gas oven Contained within a spray booth Cefla #CE-3570B
II.A.3	Five (5) Spray Booths Equipped with HVLP spray guns and particulate filters
II.A.4	One (1) Cyclone Vents to baghouse
II.A.5	One (1) Baghouse Vents internally
II.A.6	Two (2) Drying Ovens

SECTION II: SPECIAL PROVISIONS

II.B <u>REQUIREMENTS AND LIMITATIONS</u>

II.B.1	Site-Wide Requirements
II.B.1.a	Unless otherwise specified in this AO, the owner/operator shall not allow visible emissions from any stationary point on site to exceed 10% opacity. [R307-401-8]
II.B.1.a.1	Unless otherwise specified in this AO, opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9. [R307-401-8]

II.B.1.b	The owner/operator shall comply with all applicable requirements of R307-343 for Wood Furniture Manufacturing Operations in Davis and Salt Lake Counties and ozone non-attainment areas. [R307-343]
II.B.1.c	The owner/operator shall equip each paint spray booth and the reciprocating spray machine with a set of paint arrester particulate filters to control particulate emissions. All air exhaust from spray booths as well as reciprocating spray machines shall pass through these filters before being vented to the atmosphere. [R307-401-8]
II.B.2	Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Limitations
II.B.2.a	The owner/operator shall not emit more than the following from lacquer spray booths, solvent cleaning, combustion sources, and associated surface coating operations following on site:
	A. 49.00 tons of VOCs per rolling 12-month period
	B. 12.16 tons of combined HAPs per rolling 12-month period
	C. 9.99 tons of any single HAP per rolling 12-month period.
	[R307-401-8]
II.B.2.a.1	The owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. The owner/operator shall use a mass-balance method to calculate emissions from evaporative sources. The owner/operator may use the following equations with the applicable units to comply with the mass balance method:
	VOCs = [% VOC by Weight/100] x [Density] x [Volume Consumed]
	HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed]
	[R307-401-8]
II.B.2.a.2	The owner/operator shall use a mass-balance method to quantify any amount of VOCs and HAPs reclaimed. The owner/operator shall subtract the amount of VOCs and HAPs reclaimed from the quantities calculated above to provide the monthly total emissions of VOCs and HAPs. [R307-401-8]
II.B.2.a.3	The owner/operator shall keep records each month of the following:
	A. The name (as per SDS) of the VOC- and HAP-emitting material
	B. The maximum percent by weight of VOCs and each HAP in each material used
	C. The density of each material used
	D. The volume of each VOC- and HAP-emitting material used
	E. The amount of VOCs and the amount of each HAP emitted from each material
	F. The amount of VOCs and the amount of each HAP reclaimed and/or controlled from each material
	G. The total amount of VOCs, the total amount of each HAP, and the total amount of all HAPs combined emitted from all materials (in tons).
	[R307-401-8]

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PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes Is Derived From Incorporates AO DAQE-AN105580009-18 dated September 25, 2018 NOI dated June 25, 2024 Additional information dated September 11, 2024

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify
	sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98,
COM	Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality This is a document tracking code for internal Division of Air Quality use
DAQE EPA	This is a document tracking code for internal Division of Air Quality use
FDCP	Environmental Protection Agency Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations 92.21 (0)(49)(1)
UWI	12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO _x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
	Particulate matter less than 10 microns in size
PM_{10}	
PM _{2.5}	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	
VUC	Volatile organic compounds