State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

RN104820004

July 16, 2025

Max Kelsch
Fashion Cabinet Manufacturing Inc.
5440 W Axel Park Rd
West Jordan, UT 84081
max@fashioncabinet.com

Dear Max Kelsch,

Re: Engineer Review:
Modification to Approval Order DAQE-AN104820003-24 for Primer Basecoat Usage Flexibility
Project Number: N104820004

The DAQ requests a company representative review and sign the attached Engineer Review (ER). This ER identifies all applicable elements of the New Source Review permitting program. Fashion Cabinet Manufacturing Inc. should complete this review within **10 business days** of receipt.

Fashion Cabinet Manufacturing Inc. should contact **Christine Bodell** at (385) 290-2690 if there are questions or concerns with the review of the draft permit conditions. Upon resolution of your concerns, please email **Christine Bodell** at **cbodell@utah.gov** the signed cover letter. Upon receipt of the signed cover letter, the DAQ will prepare an ITA for a 30-day public comment period. At the completion of the comment period, the DAQ will address any comments and will prepare an Approval Order (AO) for signature by the DAQ Director.

If Fashion Cabinet Manufacturing Inc. does not respond to this letter within **10 business days,** the project will move forward without source concurrence. If Fashion Cabinet Manufacturing Inc. has concerns that cannot be resolved and the project becomes stagnant, the DAQ Director may issue an Order prohibiting construction.

Approval Signature _____
(Signature & Date)

UTAH DIVISION OF AIR QUALITY
ENGINEER REVIEW

SOURCE INFORMATION

Project Number	N104820004
Owner Name	Fashion Cabinet Manufacturing Inc.
Mailing Address	5440 W Axel Park Rd West Jordan, UT, 84081
Source Name	Fashion Cabinet Manufacturing, Inc.- Cabinet Manufacturer
Source Location	5440 W Axel Park Rd. West Jordan, UT 84081
UTM Projection	413,605 m Easting, 4,492,186 m Northing
UTM Datum	NAD83
UTM Zone	UTM Zone 12
SIC Code	2434 (Wood Kitchen Cabinets)
Source Contact	Max Kelsch
Phone Number	(801) 280-0646
Email	max@fashioncabinet.com
Billing Contact	Max Kelsch
Phone Number	(801) 280-0646
Email	max@fashioncabinet.com
Project Engineer	Christine Bodell, Engineer
Phone Number	(385) 290-2690
Email	cbodell@utah.gov
Notice of Intent (NOI) Submitted	June 23, 2025
Date of Accepted Application	July 1, 2025

SOURCE DESCRIPTION

General Description
Fashion Cabinet Manufacturing, Inc. (Fashion Cabinet) manufactures and finishes kitchen cabinets. Various wood products (lumber, fiberboard, and plywood) are milled, sanded, and assembled into boxes and doors. The fabricated products are then sprayed with various combinations of sealer, stain, and topcoats in spray booths. Dust from the milling and sanding operations is captured by baghouses and vented indoors or outdoors depending on the time of year. The surface coating lines are controlled by particulate filters, HVLP guns, and VOC and HAP emission limitations. Various natural gas-fired heaters rated less than 5.0 MMBtu/hr are used throughout the facility.

NSR Classification:
Minor Modification at Minor Source

Source Classification
Located in Northern Wasatch Front O3 NAA, Salt Lake City UT $PM_{2.5}$ NAA, Salt Lake County SO_2 NAA
Salt Lake County
Airs Source Size: B

Applicable Federal Standards
None

Project Proposal
Modification to Approval Order DAQE-AN104820003-24 for Primer Basecoat Usage Flexibility

Project Description
Fashion Cabinet has requested a modification to Approval Order (AO) DAQE-AN104820003-24, dated July 3, 2024, to remove Condition II.B.2.b. The Condition states "The owner/operator shall not use a primer basecoat that contains greater than 0.2% VOCs by weight or contains any HAPs for all paint-grade cabinet finishes." Fashion Cabinet has expressed that this condition restricts its capabilities in deviating from a limited selection of water-based primer products, which may impact business in the event of quality issues.

Fashion Cabinets has confirmed that it will still operate within the existing VOC and HAPs limits outlined in Condition II.B.2.a of the 2024 AO. Therefore, the site-wide PTE of the facility will not be increasing. In order to provide Fashion Cabinets with operational flexibility, Condition II.B.2.b. will be removed. Therefore, this project will be processed as a modification.

EMISSION IMPACT ANALYSIS

The VOCs and HAPs limits in Condition II.B.2.a of the 2024 AO shall still apply to all evaporative sources on site. Therefore, there is no increase in the PTE for all criteria pollutants and HAPs emissions. Therefore, modeling is not required at this time.
[Last updated June 26, 2025]

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	0.10
Nitrogen Oxides	0	0.49
Particulate Matter - PM_{10}	0	4.66
Particulate Matter - $PM_{2.5}$	0	4.66
Volatile Organic Compounds	0	49.31

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Cumene (CAS #98828)	0	240
Ethyl Benzene (CAS #100414)	0	2600
Formaldehyde (CAS #50000)	0	300
Generic HAPs (CAS #GHAPS)	0	61
Hexane (CAS #110543)	0	780
Toluene (CAS #108883)	0	2440
Xylenes (Isomers And Mixture) (CAS #1330207)	0	14600
	Change (TPY)	**Total (TPY)**
Total HAPs	0	10.51

Note: Change in emissions indicates the difference between previous AO and proposed modification.

Review of BACT for New/Modified Emission Units

1. **BACT review regarding Removal of VOC and HAP Limits for Primer Basecoat**
The requested change does not result in an increase in any site-wide emissions. The VOCs and HAPs limits in Condition II.B.2.a of the 2024 AO shall still apply to all evaporative sources on site. Fashion Cabinets will continue to apply previously accepted BACT to its operations, which includes complying with the requirements of UAC R307-343, "Wood Furniture Manufacturing Operations".
[Last updated July 16, 2025]

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO. **(New or Modified conditions are indicated as "New" in the Outline Label):**

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]
I.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

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO. **(New or Modified conditions are indicated as "New" in the Outline Label):**

II.A THE APPROVED EQUIPMENT

II.A.1	**Fashion Cabinet Manufacturing, Inc.** Cabinet Manufacturer
II.A.2	**Six (6) Manual Spray Booths** Controls: Particulate Filters (each)
II.A.3	**One (1) Automated Spray Booth** Controls: Particulate Filters
II.A.4	**Three (3) Baghouses with Cyclones** Three (3) baghouses in series with three (3) cyclones Maximum Capacities: One (1) 50 hp baghouse; Two (2) 100 hp baghouses Control milling and sanding operations
II.A.5	**Miscellaneous Boilers and Heaters** Includes: Space Heaters and Air Make-Up Units Maximum Rated Capacity: Less than 5.0 MMBtu/hr each Fuel: Natural Gas
II.A.6	**One (1) Laminator** Listed for Identification Purposes Only

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO. **(New or Modified conditions are indicated as "New" in the Outline Label):**

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Source-Wide Requirements**

II.B.1.a	The owner/operator shall not allow visible emissions from the following emission points to exceed the following values: A. Spray booth ventilation exhaust stacks - 10% opacity B. Baghouses - 10% opacity C. All other emission points - 20% opacity [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.1.b	The owner/operator shall comply with all applicable requirements of UAC R307-343, "Wood Furniture Manufacturing Operations". [R307-343]
II.B.1.c	The owner/operator shall comply with all applicable requirements of UAC R307-342, "Adhesives and Sealants". [R307-342]
II.B.1.d NEW	The owner/operator shall comply with all applicable requirements of UAC R307-315, "NO_x and CO Emission Controls for Natural Gas-Fired Boilers 2.0-5.0 MMBtu". [R307-315]
II.B.2	**VOC & HAP Requirements**
II.B.2.a	The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site: A. 49.31 tons per rolling 12-month period of VOCs B. 8.76 tons per rolling 12-month period of all HAPs combined C. 1.30 tons per rolling 12-month period of ethyl benzene D. 0.15 tons per rolling 12-month period of formaldehyde E. 1.22 tons per rolling 12-month period of toluene F. 7.30 tons per rolling 12-month period of xylene [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 applicable units to comply with the mass-balance method: VOCs = [% VOCs 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]
II.B.3	**Baghouse Requirements**
II.B.3.a	The owner/operator shall control all milling and sanding operations with baghouses in series with cyclones. [R307-401-8]
II.B.3.b	The owner/operator shall maintain the pressure drop for each milling and sanding baghouse between 4.0 and 6.0 inches of water column. [R307-401-8]
II.B.3.b.1	The owner/operator shall monitor and record the pressure drop once daily, while the baghouses are operating. [R307-401-8]
II.B.3.b.2	The owner/operator shall monitor the pressure drop with equipment located such that an inspector/operator can safely read the output at any time. [R307-401-8]
II.B.3.b.3	The owner/operator shall calibrate all instruments according to the manufacturer's instructions at least once every 12 months. [R307-401-8]
II.B.3.c	The owner/operator shall not vent the baghouses outside of the building during the period from September 30 through May 1 of each year. [R307-401-8]

II.B.3.c.1	The owner/operator shall inspect the baghouse vents monthly to verify whether venting is indoors or outdoors. Records of baghouse vent inspections shall include the following: A. Date of inspection B. Name of person conducting inspection C. Vent location D. Inspection results (venting indoors or outdoors) [R307-401-8]
II.B.4	**Spray Booth Requirements**
II.B.4.a	The owner/operator shall equip each spray booth with paint arrestor particulate filters, or equivalent, to control particulate emissions. All air exiting the spray booths shall pass through this control system before being vented to the atmosphere. [R307-401-8]
II.B.4.b	The spray booths shall be equipped with HVLP spray guns, or an equivalent method, to control VOC emissions. [R307-343-5]

PERMIT HISTORY

When issued, the approval order shall supersede (if a modification) or will be based on the following documents:

Supersedes	AO DAQE-AN104820003-24 dated July 3, 2024
Is Derived From	NOI dated June 23, 2025

REVIEWER COMMENTS

1. **Comment regarding Modification Request:**
The primer coating described in Condition II.B.2.b of the 2024 AO the is Sher-Wood 5421W Gen II Universal Primer. Sher-Wood 5421W is a water-based primer containing only 0.2% VOC (0.025 lbs/gallon).

While removing this Condition would give Fashion Cabinet operation flexibility to use a primer basecoat with a higher VOC and/or HAP content, Fashion Cabinets has verified that it will continue to operate under the existing VOC and HAPs limits outlined in Condition II.B.2.a.

Fashion Cabinet is currently permitted as a synthetic minor source under the 2024 AO. At the time of issuance of the 2024 AO, the major source threshold for the Northern Wasatch Front Ozone Nonattainment Area was being reduced to 50 tons per year (tpy) each of nitrogen oxides (NO_x) and volatile organic compounds (VOCs) due to redesignation from moderate to serious. Per 40 CFR 70 (Title V), a major stationary source of air pollutants, as defined in section 302 of the Act, is a source that directly emits, or has the potential to emit, 50 tpy or more in areas classified or treated as classified as "Serious". The Cabinet Manufacturing Facility had the potential to exceed this value, but has taken restrictions so that the VOCs emissions are reduced to below the 50 tpy threshold. Therefore, at the time of issuance of the 2024 AO, this facility was classified as a Synthetic Minor Source under 40 CFR 70.

Since then, the Northern Wasatch Front Ozone Nonattainment Area has maintained its nonattainment status as "moderate". The major source threshold value of 50 tpy each of NO_x or VOCs no longer applies. Therefore, the "Airs Source Size" under the "Source Classification" on page 3 of the AO has been updated from synthetic minor (SM) to true minor (B).

[Last updated July 1, 2025]

2. **Comment regarding NSPS and MACT Applicability:**
The UDAQ has identified the following as not applicable to Fashion Cabinet:

40 CFR 63 MACT Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations
This subpart applies to each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and is located at a plant site that is a major source for HAPs. Fashion Cabinet will be classified as an area source for HAPs, with HAP limits established below the major source thresholds of 10 TPY for an individual HAP and 25 TPY of combined HAPs. Therefore, Fashion Cabinet is not subject to MACT Subpart JJ. [Last updated June 26, 2025]

3. **Comment regarding Title V Applicability:**

Title V of the 1990 CAA (Title V) applies to the following:

A. Any major source

B. Any source subject to a standard, limitation, or other requirement under Section 111 of the Act, Standards of Performance for New Stationary Sources

C. Any source subject to a standard or other requirement under Section 112 of the Act, Hazardous Air Pollutants

D. Any Title IV-affected source

This facility is not a major source and is not a Title IV-affected source. The facility is not subject to 40 CFR 60 (NSPS), 40 CFR 61 (NESHAP), or 40 CFR 63 (MACT) regulations. Therefore, Title V does not apply to this facility. [Last updated June 26, 2025]

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 EPA 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 - 40 CFR Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal UDAQ use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - 40 CFR 52.21 (b)(49)(i)
GWP	Global Warming Potential - 40 CFR Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/HR	Pounds per hour
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
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	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	Volatile organic compounds

State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

RN104820004

July 16, 2025

Max Kelsch
Fashion Cabinet Manufacturing Inc.
5440 W Axel Park Rd
West Jordan, UT 84081
max@fashioncabinet.com

Dear Max Kelsch,

Re: Engineer Review:
Modification to Approval Order DAQE-AN104820003-24 for Primer Basecoat Usage Flexibility
Project Number: N104820004

The DAQ requests a company representative review and sign the attached Engineer Review (ER). This ER identifies all applicable elements of the New Source Review permitting program. Fashion Cabinet Manufacturing Inc. should complete this review within **10 business days** of receipt.

Fashion Cabinet Manufacturing Inc. should contact **Christine Bodell** at (385) 290-2690 if there are questions or concerns with the review of the draft permit conditions. Upon resolution of your concerns, please email **Christine Bodell** at **cbodell@utah.gov** the signed cover letter. Upon receipt of the signed cover letter, the DAQ will prepare an ITA for a 30-day public comment period. At the completion of the comment period, the DAQ will address any comments and will prepare an Approval Order (AO) for signature by the DAQ Director.

If Fashion Cabinet Manufacturing Inc. does not respond to this letter within **10 business days,** the project will move forward without source concurrence. If Fashion Cabinet Manufacturing Inc. has concerns that cannot be resolved and the project becomes stagnant, the DAQ Director may issue an Order prohibiting construction.

Approval Signature Brandon K. Kelsch for 7-29-25
(Signature & Date)

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-AN104820003-24

July 3, 2024

Max Kelsch
Fashion Cabinet Manufacturing, Incorporated
5440 West Axel Park Road
West Jordan, UT 84081
max@fashioncabinet.com

Dear Mr. Kelsch:

Re: Approval Order: Administrative Amendment to Approval Order DAQE-AN104820002-22 to Change Type of Primer Basecoat, Resulting in a Reduction in Air Pollutants under Rule R307-401-12
Project Number: N104820003

The attached Approval Order (AO) is issued pursuant to the Notice of Intent (NOI) received on May 21, 2024. Fashion Cabinet Manufacturing, Incorporated must comply with the requirements of this AO, all applicable state requirements (R307), and Federal Standards.

The project engineer for this action is **Christine Bodell**, who can be contacted at (385) 290-2690 or cbodell@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,

Bryce C. Bird
Director

BCB:CB:jg

cc: Salt Lake County Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

APPROVAL ORDER
DAQE-AN104820003-24
Administrative Amendment to Approval Order DAQE-AN104820002-22 to Change Type of Primer Basecoat, Resulting in a Reduction in Air Pollutants under Rule R307-401-12

Prepared By
Christine Bodell, Engineer
(385) 290-2690
cbodell@utah.gov

Issued to
Fashion Cabinet Manufacturing, Incorporated - Cabinet Manufacturer

Issued On
July 3, 2024

Issued By

Bryce C. Bird
Director
Division of Air Quality

TABLE OF CONTENTS

GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Fashion Cabinet Manufacturing, Incorporated

Source Name
Fashion Cabinet Manufacturing, Incorporated - Cabinet Manufacturer

Mailing Address
5440 West Axel Park Road
West Jordan, UT 84081

Physical Address
5440 West Axel Park Road
West Jordan, UT 84084

Source Contact
Name: Max Kelsch
Phone: (801) 280-0646
Email: max@fashioncabinet.com

UTM Coordinates
413,605 m Easting
4,492,186 m Northing
Datum NAD83
UTM Zone 12

SIC code 2434 (Wood Kitchen Cabinets)

SOURCE INFORMATION

General Description
Fashion Cabinet Manufacturing, Incorporated (Fashion Cabinet) manufactures and finishes kitchen cabinets. Various wood products (lumber, fiberboard, and plywood) are milled, sanded, and assembled into boxes and doors. The fabricated products are then sprayed with various combinations of sealer, stain, and topcoats in spray booths. Dust from the milling and sanding operations is captured by baghouses and vented indoors or outdoors, depending on the time of year. The surface coating lines are controlled by particulate filters, HVLP guns, and VOC and HAP emission limitations. Various natural gas-fired heaters rated less than 5.0 MMBtu/hr are used throughout the facility.

NSR Classification
Administrative Amendment

Source Classification
Located in Northern Wasatch Front O3 NAA, Salt Lake City UT $PM_{2.5}$ NAA, Salt Lake County SO_2 NAA
Salt Lake County
Airs Source Size: SM

Applicable Federal Standards
None

Project Description
Fashion Cabinet has requested an administrative amendment to Approval Order (AO) DAQE-AN104820002-22, dated November 2, 2022, to reduce the VOC and HAPs limits outlined in Condition II.B.2.a.

Fashion Cabinets' emissions of VOCs and HAPs are associated with the application of various coatings, sealers, and stains to fabricated cabinets produced within the facility. A significant portion of the customer cabinet orders produced by Fashion Cabinets have a paint-grade finish, in which cases a base "primer coating" is applied to the surface of the cabinets prior to the application of the top coatings. Fashion Cabinet will be switching to a primer coating with a lower VOC and HAP content than what is currently used.

The changes will result in a net decrease in all emissions. This project meets the requirements of Utah Administrative Code R307-401-12, Reduction in Air Pollutants, and does not require a public comment period.

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	0.10
Nitrogen Oxides	0	0.49
Particulate Matter - PM_{10}	0	4.66
Particulate Matter - $PM_{2.5}$	0	4.66
Volatile Organic Compounds	-6.69	49.31

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Cumene (CAS #98828)	0	240
Ethyl Benzene (CAS #100414)	-320	2600
Formaldehyde (CAS #50000)	0	300
Generic HAPs (CAS #GHAPS)	0	61
Hexane (CAS #110543)	0	780
Toluene (CAS #108883)	0	2440
Xylenes (Isomers And Mixture) (CAS #1330207)	-1960	14600
	Change (TPY)	**Total (TPY)**
Total HAPs	-1.14	10.51

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]
I.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 THE APPROVED EQUIPMENT

II.A.1	**Fashion Cabinet Manufacturing, Incorporated** Cabinet Manufacturer
II.A.2	**Six (6) Manual Spray Booths** Controls: Particulate Filters (each)
II.A.3	**One (1) Automated Spray Booth** Controls: Particulate Filters
II.A.4	**Three (3) Baghouses with Cyclones** Three (3) baghouses in series with three (3) cyclones Maximum Capacities: One (1) 50 hp baghouse; two (2) 100 hp baghouses Control milling and sanding operations
II.A.5	**Miscellaneous Boilers and Heaters** Includes: Space Heaters and Air Make-Up Units Maximum Rated Capacity: Less than 5.0 MMBtu/hr each Fuel: Natural Gas
II.A.6	**One (1) Laminator** Listed for Identification Purposes Only

SECTION II: SPECIAL PROVISIONS

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Source-Wide Requirements**
II.B.1.a	The owner/operator shall not allow visible emissions from the following emission points to exceed the following values: A. Spray booth ventilation exhaust stacks - 10% opacity. B. Baghouses - 10% opacity. C. All other emission points - 20% opacity. [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.1.b	The owner/operator shall comply with all applicable requirements of UAC R307-343, "Wood Furniture Manufacturing Operations." [R307-343]
II.B.1.c	The owner/operator shall comply with all applicable requirements of UAC R307-342, "Adhesives and Sealants." [R307-342]
II.B.2	**VOC and HAP Requirements**
II.B.2.a	The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site: A. 49.31 tons per rolling 12-month period of VOCs. B. 8.76 tons per rolling 12-month period of all HAPs combined. C. 1.30 tons per rolling 12-month period of ethyl benzene. D. 0.15 tons per rolling 12-month period of formaldehyde. E. 1.22 tons per rolling 12-month period of toluene. F. 7.30 tons per rolling 12-month period of xylene. [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 applicable units to comply with the mass-balance method: VOCs = [% VOCs 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 Safety Data Sheet (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]
II.B.2.b	The owner/operator shall not use a primer basecoat that contains greater than 0.2% VOCs by weight or contains any HAPs for all paint-grade cabinet finishes. [R307-401-8]
II.B.2.b.1	To demonstrate compliance with the above condition, the owner/operator shall maintain records of the SDS for the primer basecoat. [R307-401-8]
II.B.3	**Baghouse Requirements**
II.B.3.a	The owner/operator shall control all milling and sanding operations with baghouses in series with cyclones. [R307-401-8]
II.B.3.b	The owner/operator shall maintain the pressure drop for each milling and sanding baghouse between 4.0 and 6.0 inches of water column. [R307-401-8]
II.B.3.b.1	The owner/operator shall monitor and record the pressure drop once daily, while the baghouses are operating. [R307-401-8]
II.B.3.b.2	The owner/operator shall monitor the pressure drop with equipment located such that an inspector/operator can safely read the output at any time. [R307-401-8]
II.B.3.b.3	The owner/operator shall calibrate all instruments according to the manufacturer's instructions at least once every 12 months. [R307-401-8]
II.B.3.c	The owner/operator shall not vent the baghouses outside of the building during the period from September 30th through May 1st of each year. [R307-401-8]

II.B.3.c.1	The owner/operator shall inspect the baghouse vents monthly to verify whether venting is indoors or outdoors. Records of baghouse vent inspections shall include the following: A. Date of inspection. B. Name of person conducting inspection. C. Vent location. D. Inspection results (venting indoors or outdoors). [R307-401-8]
II.B.4	**Spray Booth Requirements**
II.B.4.a	The owner/operator shall equip each spray booth with paint arrestor particulate filters, or equivalent, to control particulate emissions. All air exiting the spray booths shall pass through this control system before being vented to the atmosphere. [R307-401-8]
II.B.4.b	The spray booths shall be equipped with HVLP spray guns, or an equivalent method, to control VOC emissions. [R307-343-5]

PERMIT HISTORY

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

Supersedes	AO DAQE-AN104820002-22 dated November 2, 2022
Is Derived From	NOI dated May 21, 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, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	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 Part 86.1818-12(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
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	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	Volatile organic compounds

RMEC Environmental, Inc.
476 West 325 South
Bountiful, UT 84010

info@rmec.net
office: 801.467.3661
rmec.net

RMEC PJ25E-5098

June 23, 2025

Bryce Bird
Director
Utah Division of Air Quality
195 North 1950 West
P.O. Box 144820
Salt Lake City, Utah 84114-4820

SUBJECT: APPROVAL ORDER MODIFICATION REQUEST

RE: FASHION CABINETS MANUFACTURING, INC. – CABINET MANUFACTURER
(UDAQ Approval Order: DAQE-AN104820003-24)
5440 West Axel Park Road
West Jordan, UT 84081

Dear Mr. Bird:

On behalf of Fashion Cabinets Manufacturing, Inc. (Fashion Cabinets), RMEC Environmental, Inc. (RMEC) is hereby providing the Utah Division of Air Quality (UDAQ) with the following request for a modification of the above-referenced Approval Order (AO).

DESCRIPTION OF MODIFICATION

Fashion Cabinets' emissions of VOCs and HAPs are associated with application of various coatings, sealers, and stains to fabricated cabinets produced within the facility. In 2024, Fashion Cabinets submitted an administrative amendment notification to account for a "*Reduction in Air Pollutants*" (as per Utah Administrative Code R304-401-12) associated with a transition from an oil-based primer, containing more 34% VOCs along with the HAPs xylene and ethylbenzene, to a HAP-free water-based primer containing only 0.2% VOC. In addition to a 6.7-ton reduction in VOCs, the modification resulted in more than a 1-ton reduction in HAPs.

The purpose of this modification is to eliminate condition II.B.2.b of the AO, which restricts the use of primer base coats containing hazardous air pollutants (HAPs) or having more than 0.2% volatile organic compound (VOCs) by weight. For almost a year now, Fashion Cabinets has been able to comply with the conditions of II.B.2.b while maintaining emissions of VOCs and HAPs well within the current permit limits; however, this condition restricts their capabilities in deviating from a very limited selection of water-based primer products. Primer coating operations are a critical element of their cabinet productions, and this restriction could have crippling impacts on their business in the event of quality issues, which can arise as the result of changes in substrates, top coats, and/or environmental/meteorological conditions.

Based on the above, Fashion Cabinets is hereby requesting the condition II.B.2.b be removed from the AO. Total site-wide emissions will continue to remain below the limits specified in the AO.

BACT ANALYSIS

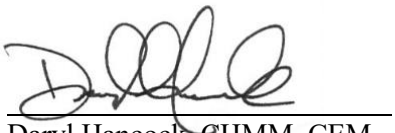
Fashion Cabinets will continue to maintain emissions below the current levels specified in the AO while also complying with the conditions of UAC R307-343, "*Wood Furniture Manufacturing Operations*", which specifically entails:

- Adherence to VOC Content Limitations as per R307-343-4: Table 1.
- Use of HVLP spray guns or other coating applications that achieve a transfer efficiency to HVLP application methods, as per R307-343-5.
- Implementation of Work Practices, as per R307-343-7.
- Recordkeeping, as per R307-343-8.

CLOSING

Please feel free to contact me or Max Kelsch if you have any questions or concerns regarding this request. Max can be reached at 801.280.0646 ext. 312. or by email at max@fashioncabinet.com. I can be reached at 801.467.3661 or by email at dhancock@rmec.net.

Sincerely,



Daryl Hancock, CHMM, CEM
Principal Scientist
RMEC ENVIRONMENTAL, INC.