



State of Utah

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Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-AN104820004-25

September 11, 2025

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

Dear Mr. Kelsch:

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

The attached Approval Order (AO) is issued pursuant to the Notice of Intent (NOI) received on June 23, 2025. Fashion Cabinet Manufacturing, Inc. 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. No public comments were received on this action.

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-AN104820004-25
Modification to Approval Order DAQE-AN104820003-24 for
Primer Basecoat Usage Flexibility

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

Issued to
Fashion Cabinet Manufacturing, Inc. - Cabinet Manufacturer

Issued On
September 11, 2025

Issued By



Bryce C. Bird
Director
Division of Air Quality

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name

Fashion Cabinet Manufacturing, Inc.

Source Name

Fashion Cabinet Manufacturing, Inc. - Cabinet Manufacturer

Mailing Address

5440 West Axel Park Road
West Jordan, UT 84081

Physical Address

5440 West Axel Park Road
West Jordan, UT 84081

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, 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, high volume low pressure (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 SO₂ NAA
Salt Lake County
Airs Source Size: B

Applicable Federal Standards

None

Project Description

Fashion Cabinet has requested a modification to 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 Cabinet has confirmed that it will still operate within the existing VOC and HAP 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 Cabinet with operational flexibility, Condition II.B.2.b. will be removed. Therefore, this project will be processed as a modification.

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

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, 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

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	Site-Wide Requirements
II.B.1.a	<p>The owner/operator shall not allow visible emissions from the following emission points to exceed the following values:</p> <ul style="list-style-type: none"> A. Spray booth ventilation exhaust stacks - 10% opacity B. Baghouses - 10% opacity C. All other emission points - 20% opacity. <p>[R307-401-8]</p>
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	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 and HAP Requirements
II.B.2.a	<p>The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site:</p> <ul style="list-style-type: none"> 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. <p>[R307-401-8]</p>
II.B.2.a.1	<p>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:</p> <p>VOCs = [% VOCs by Weight/100] x [Density] x [Volume Consumed]</p> <p>HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed]</p> <p>[R307-401-8]</p>

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	<p>The owner/operator shall keep records each month of the following:</p> <ul style="list-style-type: none"> 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). <p>[R307-401-8]</p>
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	<p>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:</p> <ul style="list-style-type: none"> A. Date of inspection B. Name of person conducting inspection C. Vent location D. Inspection results (venting indoors or outdoors). <p>[R307-401-8]</p>

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
Is Derived From

AO DAQE-AN104820003-24 dated July 3, 2024
NOI dated June 23, 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 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