

**AIR EMISSION PERMIT NO. 04500034- 001**

**IS ISSUED TO**

Tuohy Furniture Corporation

Tuohy Furniture Corp - Chatfield

42 St Albans Place

Chatfield, Fillmore County, MN 55923

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	04/13/95

This permit authorizes the permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit and with all general conditions listed in Minn. R. pt. 7007.0800, subp. 16, which are incorporated by reference. Any changes or modifications to the stationary source must be performed in compliance with Minn. Rules pts. 7007.1150 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** State; Syn Min Part 70

**Issue Date:** January 8, 1998

**Expiration:** Permit does not expire  
All Title I Conditions do not expire.

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Michael J. Sandusky  
Acting Division Manager  
Air Quality Division

for Peder A. Larson  
Acting Commissioner  
Minnesota Pollution Control Agency

JKD:dal

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(612)296-6300
Outside Metro Area	1-800-657-3864
TTY	(612)282-5332

The rule governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

**PERMIT SHIELD:**

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Any requirements which have been determined not to apply are listed in Table A of this permit.

The permit shield, however does not apply to: Minn. R. ch. 7030 (Noise Pollution Control).

**FACILITY DESCRIPTION:**

Tuohy Furniture Corporation manufactures wood office furniture. Emission units at the existing facility include four wood fired boilers, two spray paint booths, hand applied adhesives and clean-up processes. The main pollutants of concern are the Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAP), particulate matter and particulate matter less than 10 microns from the spray paint booths and the clean-up processes. The facility is considered a non-major source under 40 CFR § 52.21 and 40 CFR § 70.2 for volatile organic compounds and under 40 CFR § 70.2 and 40 CFR § 63.2 for HAPs through usage limits on these pollutants. The facility is considered a non-major source under 40 CFR § 52.21 and 40 CFR § 70.2 for particulate matter less than 10 microns and particulate matter by limiting VOC usage and the use of control equipment on the two spray booths.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.**

**Subject Item:****Total Facility**

<b>What to do</b>	<b>Why to do it</b>
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Wood Combustion in the Boiler and Furnaces. Retain at the stationary source an operation and maintenance plan for wood combustion in the boilers and furnaces.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Shutdowns: Notify the Commissioner at least 24 hours in advance of shutdown of any process or control equipment if the shutdown would cause an increase in the emission of air contaminants. At the time of notification, notify the Commissioner of the cause of the shutdown and the estimated duration. Notify the Commissioner again when the shutdown is over.	Minn. R. 7019.1000, subp. 1
Breakdowns: Notify the Commissioner immediately of a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of air contaminants. At the time of notification or as soon thereafter as possible, the permittee shall also notify the Commissioner of the cause of the breakdown and the estimated duration. Notify the Commissioner again when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Oral Notification of Deviations Endangering Human Health or the Environment: Within 24 hours of discovery, orally notify the Commissioner of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7007.0800, subp. 6(A)
Written Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: cause of the deviation; exact dates of the period of the deviation; if the deviation has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A)
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H)	Minn. R. 7007.1400, subp. 1(H)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007. 0800, subp. 5(B)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16	Minn. R. 7007.0800, subp. 16
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item: GP 001 VOC Emission Sources****Associated Items:** CE 002 Mat or Panel Filter

CE 003 Mat or Panel Filter

EU 002 Paint Booth #1

EU 003 Paint Storage Area

EU 021 Paint Booth #2

EU 022 Hand Applied Adhesives

EU 023 Cleaning Area

SV 002

SV 003

SV 008

What to do	Why to do it
VOC Usage: less than or equal to 90 tons/year using 12-month Rolling Sum (purchases) calculated monthly. Monthly VOC Usage and Total VOC Usage for the previous 12 months shall be calculated and recorded by the 15th day of the following calendar month. VOC content shall be determined as described under Material Content.	Title I Condition: Limit to avoid major source classification under 40 CFR 52.21; to avoid major source classification under 40 CFR 70.2
Total HAP Usage: less than or equal to 24.0 tons/year using 12-month Rolling Sum (purchases) calculated monthly. Monthly Total HAP Usage and Total HAP Usage for the previous 12 months shall be calculated and recorded by the 15th day of the following calendar month. HAP Content shall be determined as described under Material Content.	To avoid major source classification under 40 CFR 70.2 and 40 CFR 63.2
Single HAP Usage: less than or equal to 9.0 tons/year using 12-month Rolling Sum (purchases) calculated monthly. Monthly Single HAP Usage and the total Single HAP Usage for the previous 12 months shall be calculated and recorded by the 15th day of the following calendar month. HAP content shall be determined as described under Material Content.	To avoid major source classification under 40 CFR 70.2 and 40 CFR 63.2
Material Content: HAP and VOC content shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all compliance calculations. Other alternative methods may be used to determine the material content if approved by the Division Manager. The Division Manager reserves the right to require the Permittee to take samples of the HAP and VOC containing materials, and to conduct analysis of material content as per EPA reference methods. If an EPA reference method is used for material content determination, the data obtained shall supercede the MSDS.	Title I Condition: Monitoring for limit to avoid classification as major source under 40 CFR 52.21; and to avoid major source classification under 40 CFR 70.2 and 40 CFR 63.2
For the first eleven months after permit issuance, the 12 month rolling sum usage limits for VOC Usage, Total HAP Usage and Single HAP Usage shall be determined based on the Permittees actual purchase records prior to issuance of this permit.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** SV 001**Associated Items:** EU 001 Boiler to heat plant

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0510, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** SV 002**Associated Items:** EU 002 Paint Booth #1

GP 001 VOC Emission Sources

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0710, subp. 1(A)
Opacity: less than or equal to 20 percent opacity , except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** SV 005**Associated Items:** EU 018 Kiln Boiler

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2
Monitoring of pollution control equipment: The permittee shall monitor and record the pressure drop across the cyclone (CE005) once per day while the kiln boiler (EU018) is operating.	Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5, and Minn. R. 7007.0800, subp. 14
Inspect cyclone (CE005) quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging including structural components, housings, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2, Minn. R. 7007.0800, subp. 14
Inspect cyclone (CE005) monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging for example: bearings, belts, hoses, fans, nozzles, orifices, and ducts. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2, Minn. R. 7007.0800, subp. 14

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** SV 006**Associated Items:** EU 019 Building Boiler

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** SV 007**Associated Items:** EU 020 Boiler to heat plant #3

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** SV 008**Associated Items:** EU 021 Paint Booth #2

GP 001 VOC Emission Sources

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with less stringent limit of either Minn. R. 7011. 0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** CE 002 Mat or Panel Filter**Associated Items:** EU 002 Paint Booth #1

GP 001 VOC Emission Sources

GP 002 Spray Booths

What to do	Why to do it
The Permittee shall use filters with a manufacturer's guarantee of at least 97.5% collection efficiency for particulate matter and particulate matter less than 10 microns.	Title I Condition: Use and monitoring of pollution control equipment to avoid major source classification under 52.21; to avoid major source classification under 40 CFR 70.2; Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain control equipment to insure equal to or greater than 80% capture efficiency of particulate matter and particulate matter less than 10 microns.	Title I Condition: Use and monitoring of pollution control equipment to avoid major source classification under 52.21; to avoid major source classification under 40 CFR 70.2; Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 14
Monitoring and recordkeeping (Paint filters): Visually inspect condition of filters, including but not limited to, alignment, saturation, and tears and holes. Record filter(s) condition every 24 hours if in operation. Record keeping shall include any action taken in response to observed filter condition, including the date and the time the filter is replaced.	Minn. R. 7007.0800, subp. 14
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging including structural components, housings, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2, Minn. R. 7007.0800, subp. 14
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging for example: bearings, belts, hoses, fans, nozzles, orifices, and ducts. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2, Minn. R. 7007.0800, subp. 14

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

**Subject Item:** CE 003 Mat or Panel Filter**Associated Items:** EU 021 Paint Booth #2

GP 001 VOC Emission Sources

GP 002 Spray Booths

What to do	Why to do it
The Permittee shall use filters with a manufacturer's guarantee of at least 97.5% collection efficiency for particulate matter and for particulate matter less than 10 microns.	Title I Condition: Use and monitoring of pollution control equipment to avoid major source classification under 52.21; to avoid major source classification under 40 CFR 70.2; Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain control equipment to insure equal to or greater than 80% capture efficiency of particulate matter and particulate matter less than 10 microns.	Title I Condition: Use and monitoring of pollution control equipment to avoid major source classification under 52.21; to avoid major source classification under 40 CFR 70.2; Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 14
Monitoring and recordkeeping (Paint filters): Visually inspect condition of filters, including but not limited to, alignment, saturation, and tears and holes. Record filter(s) condition every 24 hours if in operation. Record keeping shall include any action taken in response to observed filter condition, including the date and the time the filter is replaced.	Minn. R. 7007.0800, subp. 14
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging including structural components, housings, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2, Minn. R. 7007.0800, subp. 14
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging for example: bearings, belts, hoses, fans, nozzles, orifices, and ducts. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2, Minn. R. 7007.0800, subp. 14

## TABLE B: SUBMITTALS

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield  
Permit Number: 04500034 - 001

Table B lists the submittals you must send to the Commissioner. Table B is divided into two sections, for source-specific submittal requirements and for submittals required of all permittees. Source-specific submittals are further organized as either one-time only or recurrent requirements. You may also be subject to additional reporting requirements contained in the compliance schedule located in Table C of this permit. All submittals must be postmarked or received by the date specified in the table, and certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Submittals which must be provided on standardized forms approved by the Commissioner are noted in Tables B and C.

Send any application for a permit or permit amendment to: Permit Information Coordinator, Permit Section, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4914. Also send the Permit Information Coordinator notices of: accumulated insignificant activities, installation of control equipment, replacement of an emissions unit, and changes that contravene a permit term.

Send all other submittals to: Compliance Tracking Coordinator, Compliance Determination Unit, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

**TABLE B: RECURRENT SUBMITTALS**

01/08/98

Facility Name: Tuohy Furniture Corp - Chatfield

Permit Number: 04500034 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner. The report covers all deviations experienced during the calendar year.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner.	Total Facility



**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**DRAFT AIR EMISSION PERMIT NO. 04500034-001**

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

**1. General Information**

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 2521)
Tuohy Furniture Corporation  42 St. Albans Place  Chatfield, MN 55923  (507)867-4280	(same)

1.2. Description of the facility

Tuohy Furniture Corporation manufactures wood office furniture. Emission units at the existing facility include four wood fired boilers, two spray paint booths, hand applied adhesives and clean-up processes. The main pollutants of concern are the volatile organic compounds, hazardous air pollutants, particulate matter and particulate matter less than 10 microns from the spray paint booths and the clean-up processes. The facility is considered a non-major source under 40 CFR pt. 52.21 and 40 CFR pt. 70.2 for volatile organic compounds and under 40 CFR pt. 70.2 and 40 CFR pt. 63.2 for HAPs through usage limits on these pollutants. The facility is considered a non-major source under 40 CFR pt. 52.21 and 40 CFR pt. 70.2 for particulate matter less than 10 microns and particulate matter by limiting VOC usage and the use of control equipment on the two spray booths.

1.3 Description of any changes allowed with this permit issuance

Changes are not allowed by this permit.

1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the total facility permit.

Permit Number and	Action Authorized
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Permit Action Number: 001  
Date: 3/1/2004

<b>Issuance Date</b>	
N/A	This is this facilities first total facility air emission permit.

### 1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU #	SV#	Emission Unit Description	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
001	001	Boiler to heat plant	6.0	5.4	0.1	0.5	2.7	1.0	0.0	N/A	N/A
018	005	Kiln Boiler	4.3	10.6	0.5	2.2	13.1	4.6	0.0	N/A	N/A
019	006	Building Boiler	4.8	4.3	0.1	0.4	2.2	0.8	0.0	N/A	N/A
020	007	Boiler to heat plant #3	6.0	5.4	0.1	0.5	2.7	1.0	0.0	N/A	N/A
GP 001	003, 002 and 008	VOC and HAPs Emission sources	N/A	N/A	N/A	N/A	N/A	90.0	N/A	9.0	24.0
002 and 021	002 and 008	Spray booths	43.3	43.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A

	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions*	64.5	69.1	0.8	3.5	20.8	97.3	0.0	9.0	24.0
Total Facility Actual Emissions*	10.1	10.9	0.2	0.7	4.4	24.2	0.0	4.9	16.6

\*These are the limited potential emissions from column 3 in GI-07 from Delta. They differ from those in the permit application sent by the company in that they have been verified and corrected as need be by MPCA staff. These are the potential emissions that would appear in a public notice.

Table 2. Facility(TF) and Permit Classification

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (list pollutant)		VOC, PM, PM10	CO, Lead, NOx, SO2

Permit Action Number: 001

Date: 3/1/2004

NAAR (list pollutant)	N/A	N/A	N/A
Part 70 Permit Program (list pollutant)		VOC, Single HAP, Total HAP, PM, PM10	CO, Lead, NOx, SO2

\* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

## 2. Regulatory and/or Statutory Basis

Summary Regulatory and/or Statutory Basis of the Emission or Operational Limit

### Regulatory Overview of Facility

*EU, GRP, or SV #	Applicable Regulations	**Comments:
GP001	40 CFR § 52.21 40 CFR §. 70.2	Title I Condition: VOC usage limit set to avoid major source classification under 40 CFR § 52.21; to avoid major source classification under 40 CFR pt. 70.2
GP001	40 CFR § 70.2 40 CFR § 63.2	Total HAP usage limit set to avoid major source classification under 40 CFR §70.2 and 40 CFR § 63.2
GP001	40 CFR § 70.2 40 CFR § 63.2	Single HAP usage limit set to avoid major source classification under 40 CFR §70.2 and 40 CFR § 63.2
SV001	Minn. R. 7011.0510	Standards of Performance for Existing Indirect Heating Equipment
SV002 SV008	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment
SV005 SV006 SV007	Minn. R. 7011.0515	Standards of Performance for New Indirect Heating Equipment
CE002 CE003	40 CFR § 52.21 40 CFR § 70.2 Minn. R. 7007.0800, subp. 2 and 14	Title I Condition: Use and Monitoring of pollution control equipment to avoid major source classification under 40 CFR § 52.21; to avoid major source classification under 40 CFR § 70.2

## 3. Technical Information

Total HAPs potential emissions for the spraybooths were grossly overestimated by assuming all materials normally used at a spraybooth were sprayed at the same time.

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Particulate matter and particulate matter less than 10 microns are limited at the two spray booths by limiting VOC usage and requiring the use of spray booth filters with a minimum manufacturers guaranteed collection efficiency.

Due in part to the age of the wood boiler and furnaces, the number of wood fired sources at the facility, and past opacity problems attributable to incomplete combustion, a plan to maximize the combustion efficiency of the equipment was developed and is attached. The Permittee will implement and follow the actions in the plan. These standard operating procedures will improve combustion efficiency and minimize opacity and particulate matter emissions.

#### **4. Conclusion**

Based on the information provided by the Tuohy Furniture Corporation, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 04500034-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:

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Duane Middendorf  
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Attachment: GI-07 Forms  
CD-01 Forms  
PE Forms (emission calculations)  
Emission Calculations  
Boiler Operation and Maintenance Plan