



STATEMENT OF BASIS
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 BAQ Engineering Services Division
 2600 Bull Street, Columbia, SC 29201
 Phone: 803-898-4123 Fax: 803-898-4079

Company Name:	American Quality Finishing Corporation	Permit Writer:	David D. Abusah
Permit Number:	CM-1200-0227	Date:	Draft

DATE APPLICATION RECEIVED: May 01, 2009

DATE OF LAST INSPECTION: January 12, 2009. No violations of permit requirements or applicable regulations were observed during the time of inspection.

FACILITY DESCRIPTION: The facility operates a finishing process that consists of sanding wood (via automatic or hand sanding booths), painting and/or staining the wood, and buffing. The finished products are used in building yachts interior.

PROJECT DESCRIPTION: This is a renewal of the facility's CM Operating Permit. There have been no process changes to current process flow diagram or production process layout.

CHANGES SINCE LAST OP ISSUANCE: The following changes were made at the facility since the last CM Operating Permit was issued:

- On August 1, 2006; BAQ received a request from the facility to revise the CM operating permit to use a new product containing HAP and have not been previously modeled.
- On January 28, 2008; BAQ received a request from the facility to modify the description of the Waterfall (control device for unit ID 01).

SPECIAL CONDITIONS, MONITORING, LIMITS: The facility has requested limit on paint usage in unit ID 04 as 0.850 gal/day (0.1620 lb/hr dimethyl phthalate) from the fan (stack 7) for PCC-901 to ensure compliance with standard 8 modeled emission rates.

PUBLIC NOTICE: Facility has requested for renewal of their CM Operating Permit; the draft permit would be public noticed in accordance with S.C. Regulation 61-62.1, Section II (N).

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	PM/PM ₁₀	1.501	6.576	Engineering Calculations
	VOC	5.655	24.771	
	Toluene	0.299	1.312	
	MEK	0.826	3.617	
	MIBK	1.692	7.410	
	Xylene	0.551	2.415	
	Ethyl Benzene	0.109	0.479	
	Hexamethylene Diisocyanate	0.0061	0.0267	
	Toluene Diisocyanate	0.0017	0.0073	
	Glycol Ethers	0.779	3.412	
02 (Booth 2)	PM/PM ₁₀	18.169	79.578	Engineering Calculations
	VOC	20.131	88.172	
	Styrene	19.607	85.879	
	Toluene	3.715	16.270	
	MEK	6.911	30.271	
	MIBK	1.059	4.637	
	Cobalt	0.0092	0.040	
02 (Booth 3)	PM/PM ₁₀	0.032	0.139	Engineering Calculations
	VOC	7.850	34.383	
02 (Booth 4)	PM/PM ₁₀	1.00	4.380	Engineering Calculations



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UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
02 (Booth 5)	PM/PM ₁₀	1.00	4.380	Engineering Calculations
02 (Booth 6)	PM/PM ₁₀	1.051	4.604	Engineering Calculations
	VOC	22.962	100.57	
	Toluene	0.489	2.143	
	MEK	1.678	7.347	
	MIBK	0.783	3.430	
	Xylene	0.366	1.601	
	Ethyl Benzene	0.109	0.479	
	Toluene Diisocyanate	0.0017	0.0073	
	Glycol Ethers	0.779	3.412	
03	PM/PM ₁₀	31.613/23.225	138.455/101.724	Engineering Calculations
04	VOC	15.625	68.438	Engineering Calculations
	Styrene	6.117	26.793	
	Toluene	2.878	12.605	
	Dimethyl Phtalate	0.821	3.595	
	MEK	0.0684	0.300	

CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	PM/PM ₁₀	0.300	1.315	80% efficient waterfall, Engineering Calculations
	VOC	5.655	24.771	
	Toluene	0.299	1.312	
	MEK	0.826	3.617	
	MIBK	1.692	7.410	
	Xylene	0.551	2.415	
	Ethyl Benzene	0.109	0.479	
	Hexamethylene Diisocyanate	0.0061	0.0267	
	Toluene Diisocyanate	0.0017	0.0073	
	Glycol Ethers	0.779	3.412	
	02 (Booth 2)	PM/PM ₁₀	0.908	
VOC		20.131	88.172	
Styrene		19.607	85.879	
Toluene		3.715	16.270	
MEK		6.911	30.271	
MIBK		1.059	4.637	
Cobalt		0.00046	0.0020	
02 (Booth 3)	PM/PM ₁₀	0.0016	0.0070	95% efficient dry filters, Engineering Calculations
	VOC	7.850	34.383	
02 (Booth 4)	PM/PM ₁₀	0.050	0.219	95% efficient dry filters, Engineering Calculations
02 (Booth 5)	PM/PM ₁₀	0.050	0.219	95% efficient dry filters, Engineering Calculations
02 (Booth 6)	PM/PM ₁₀	0.053	0.230	95% efficient dry filters, Engineering Calculations
	VOC	22.962	100.57	
	Toluene	0.489	2.143	
	MEK	1.678	7.347	
	MIBK	0.783	3.430	
	Xylene	0.366	1.601	
	Ethyl Benzene	0.109	0.479	



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CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
	Toluene Diisocyanate	0.0017	0.0073	
	Glycol Ethers	0.779	3.412	
03	PM/PM ₁₀	0.316/0.232	1.385/1.017	99% efficient baghouse, Engineering Calculations
04	VOC	15.625	68.438	Engineering Calculations
	Styrene	6.117	26.793	
	Toluene	2.878	12.605	
	Dimethyl Phtalate	0.162*	0.709	
	MEK	0.0684	0.300	

Note: * The Dimethyl Phtalate controlled emission rate is due to operational restrictions.

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
PM/PM ₁₀	238.51/201.50	7.74/7.11
VOC	316.34	<100 TPY
Styrene	112.67	<10 TPY for single HAP <25 TPY total HAP
Toluene	32.33	
Dimethyl Phthalate	3.60	
MEK	41.54	
MIBK	15.48	
Xylene	4.02	
Cobalt	138.506	
Ethyl Benzene	102.682	
Hyxamethylene Diisocyanate	0.0267	
Toluene Diisocyanate	0.015	
Glycol Ethers	6.823	

PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)			
Section II(E): Synthetic Minor		X	This is a renewal of the facility's Conditional Major Operating permit. The facility has taken federally enforceable limits on PM and VOC for the avoidance of PSD and BACT/LAER reviews respectively.
Section II(G): Conditional Major	Y		The facility already is a Conditional Major and holds a Conditional Major permit.
Standard 1: Fuel Burning Operations		X	The processes at the facility do not involved fuel burning sources subject to this standard.
Standard 2: Ambient Air Quality Standards	Y		Facility has demonstrated compliance through modeling; see modeling summary dated September 6, 2006. No operational restriction has been established to ensure compliance with the modeled emission rates.
Standard 3: Waste Combustion/Reduction (state only)		X	The processes at the facility do not contain waste combustion or reduction sources.
Standard 3.1: HMI Waste Incinerators		X	The project does not involved medical/infectious waste incineration



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PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
Standard 4: Emissions from Process Industries	Y		All the processes at the facility are subject to 20% opacity and PM limits.
Standard 5: Volatile Organic Compounds		X	The facility was not in existence in 1979 or 1980.
Standard 5.1: BACT/LAER For VOC (state only)		X	The facility was built after July 1, 1979. The facility took a limit on VOC emission to be < 100 TPY for the avoidance of a BACT/LAER review (refer to construction permit 1200-0227-CE: Synthetic Minor construction permit issued on August 3, 2004).
Standard 5.2: Control of Oxides of Nitrogen		X	Source was permitted to construct before 06/25/2004.
Standard 7: Prevention of Significant Deterioration		X	The facility's PTE for PSD determination for PM and VOC is greater than 250 TPY; therefore the facility is major for PSD. However, the facility has avoided a PSD review by taking federally enforceable limits on PM and VOC in accordance with construction permit 1200-0227-CE. The 250 TPY limit is used because the facility is not listed among the 28 source category classified as major source under the PSD program.
Standard 7(c): Ambient Air Increments	Y		This facility has demonstrated compliance through modeling for the PSD Class II increments; see modeling summary dated September 6, 2006.
Standard 7.1: Standards for Non Attainment Areas		X	The facility is not located in a non-attainment area.
Standard 8: Toxic Air Pollutants (state only)	Y		To comply with the maximum allowable emission rates for dimethyl phthalate which is found in Polycatalyst Peroxide (PCC-901), the facility will limit the usage of PCC-901 to 0.850 gallons/day. See modeling summary dated September 6, 2006.
Regulation 61-62.6: Control of Fugitive Particulate Matter		X	This project does not have fugitive PM (Dust) emissions.
Regulation 61-62.60: SC Designated Facility Plan and NSPS		X	This facility does not contain sources subject to this standard.
Regulation 61-62.61: NESHAP		X	This facility does not contain any process/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclei, radon or vinyl chloride)
Regulation 61-62.63: NESHAP For Source Categories		X	The facility's uncontrolled HAP is greater than 10TPY for single HAP and 25 TPY for total HAP. The facility has accepted a federally enforceable limit (1200-0227-CE) to emit pollutants less than the major source thresholds in order to avoid being subject to 40CFR63 Subpart JJ.
Regulation 61-62.68: Chemical Accident Prevention		X	The facility does not store any 112 (r) regulated chemicals above threshold quantity
Regulation 61-62.70: Title V		X	The facility's PTE for Title V determination is greater than the major source thresholds. The facility has taken limits on facility wide PM ₁₀ , VOC and HAP emissions to bring their potential emissions below the thresholds.
Regulation 61-62.72: Acid Rain		X	The facility is not a utility unit.
Regulation 61-62.96: Nitrogen Oxides (NO _x) Budget Trading Program		X	The facility does not participate in NO _x emissions trading.



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PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
Regulation 61-62.99: Nitrogen Oxides (NO _x) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	This requirement applies to Kiln only.
Federal Regulations (PROJECT ONLY)			
NSPS (Part 60) Subpart(s)		X	This facility does not contain sources subject to this standard.
NESHAP (Part 61) Subpart(s)		X	This facility does not contain any process/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclei, radon or vinyl chloride)
MACT (Part 63) Subpart(s)		X	The facility's uncontrolled HAP is greater than 10TPY for single HAP and 25 TPY for total HAP. However, the facility has taken limits on HAP to be <10/25 TPY. Therefore the facility is minor for HAP and not subject to Subpart JJ (National Emission Standards For Wood Furniture Manufacturing Operations of this standard).
Area Source Standards (Part 63) Subpart(s)		X	The processes at the facility are not subject to Area Source MACT.
Compliance Assurance Monitoring (CAM) (Part 64)		X	Not a Title V facility.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

