



# Temporary Permit

**Permit No:** TP-0245

**Date Issued:** August 28, 2019

This certifies that:

**The Woodworks Architectural Millwork, Inc.**  
**16 North Wentworth Avenue**  
**Londonderry, NH 03053**

has been granted a Temporary Permit for:

**Spray Coating Processes**

at the following facility and location:

**The Woodworks Architectural Millwork, Inc.**  
**9 Delta Drive**  
**Londonderry, NH 03053**

Facility ID No: **3301590321**

Application No: **18-0257**, received December 30, 2018 – Temporary Permit

which includes devices that emit air pollutants into the ambient air as set forth in the permit application referenced above which was filed with the New Hampshire Department of Environmental Services, Air Resources Division (department) in accordance with RSA 125-C of the New Hampshire Laws. Request for permit renewal must be received by the department at least 90 days prior to expiration of this permit and must be accompanied by the appropriate permit application forms.

This permit is valid upon issuance and expires on **February 28, 2021**.

*Craig Wright*  
**COPY**

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Director  
Air Resources Division

**Abbreviations and Acronyms**

AAL	Ambient Air Limit
acf	actual cubic foot
ags	above ground surface
ASTM	American Society of Testing and Materials
Btu	British thermal units
CASRN	Chemical Abstracts Service Registry Number
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EDS	Environmental Data Sheet
Env-A	New Hampshire Code of Administrative Rules – Air Related Rules
ft	foot or feet
ft <sup>3</sup>	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant as defined in Section 112 of the 1990 Clean Air Act Amendments
hp	horsepower
hr	hour
kW	kilowatt
lb	pound
LPG	Liquefied Petroleum Gas
MM	million
MW	megawatt
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standard for Hazardous Air Pollutants
NG	Natural Gas
NHDES	New Hampshire Department of Environmental Services (the department)
NSPS	New Source Performance Standard
NO <sub>x</sub>	Nitrogen Oxides
PM <sub>10</sub>	Particulate Matter < 10 microns
ppm	parts per million
psi	pounds per square inch
RACT	Reasonably Available Control Technology
RICE	Reciprocating Internal Combustion Engine
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
scf	standard cubic foot
SDS	Safety Data Sheet
SO <sub>2</sub>	Sulfur dioxide
tpy	tons per consecutive 12-month period
TSP	Total Suspended Particulate
ULSD	Ultra Low Sulfur Diesel (15 ppm by weight)
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

**I. Facility Description**

The Woodworks Architectural Millworks, Inc. (the Facility) is located in Londonderry, New Hampshire and manufactures custom millwork fixtures from hardwood, softwood, plywood, and rough lumber. Stains and coatings that contain VOCs, RTAPs, and HAPs are used to finish the products. The Facility has requested enforceable limitations on the potential to emit to below the VOC major source threshold of 50tpy, the VOC RACT threshold of 3 tons per consecutive 12-month period for flat wood paneling coating, and below the major source threshold of 10 tpy for any individual HAP and 25 tpy for combined for all HAPs, and therefore requires a permit.

**II. Emission Unit Identification**

This permit covers the device/process identified in Table 1.

Table 1 – Emission Unit Identification			
Emission Unit ID	Process Identification	Installation Date	Maximum Capacity/ Production Capacity
EU01	Spray Paint Area consists of the following: a.) Booth 1 – Devil Biss model EC 1478-34 Spray gun – Devil Biss model JGA510	2005	Inside dimensions: 14 ft x 8 ft x 6 ft Max flow rate: up to 4 gal/hr at 6-7 lb psi
	b.) Booth 2 – JBI Industries model IBD-148-8 Spray gun – Kremlin model MVX60	2005	Inside dimensions: 14 ft x 8 ft x 6 ft Max flow rate: up to 1.5 gal/hr
	c.) Booth 3 – Devil Biss model EC 1278-34 Spray gun – Devil Biss model JGA510	2001	Inside dimension: 12 ft x 8 ft x 6 ft Max flow rate: up to 4 gal/hr at 6-7 lb psi

**III. Stack Criteria**

The device/processes listed in Table 1 shall have exhaust stacks that discharge vertically without obstruction<sup>1</sup>.

**IV. Operating and Emission Limitations**

The owner or operator shall be subject to the operating and emission limitations identified in Table 2.

Table 2 – Operating and Emission Limitations			
Item #	Requirement	Applicable Emission Unit	Regulatory Basis
1.	<u>Facility-wide Emission Limitations</u> a.) Emissions of HAPs shall be limited to less than 10 tpy for any individual HAP and less than 25 tpy for all HAP combined <sup>2</sup> ; b.) Emissions of VOC from all coatings, thinners, cleaners, and mixing operations shall be limited to less than 47 tpy <sup>3</sup> ; and	EU01	Env-A 604.02(a)(1)

<sup>1</sup> There is no impediment to vertical flow and the exhaust stack extends at least 2 feet higher than any roofline within 10 feet of the exhaust stack exit, measured horizontally.

<sup>2</sup> The Facility has the potential to emit HAPs above the major source thresholds 10 tpy for any single HAP and 25 tpy for combined HAP. The emission limitations in Table 2, Item 1.a.) are less than these thresholds and establishes the Facility as a synthetic minor source of air pollution for HAPs. In the February 8, 2018 Federal Register, the USEPA published the policy memo titled *Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act*, dated January 25, 2018. This policy memo allows major sources of HAP to accept federally enforceable permit limitations to become synthetic minor sources eliminating the requirement for a Title V Operating Permit, and allowing the source to opt out of any applicable 40 CFR part 63 major source standard.

<sup>3</sup> The Facility has the potential to emit VOCs above the major source threshold of 50 tpy. The emission limitation in Table 2, Item 1.b.) is below this threshold, establishing the facility as a synthetic minor source.

## The Woodworks Architectural Millworks, Inc. – Londonderry

Table 2 – Operating and Emission Limitations

Item #	Requirement	Applicable Emission Unit	Regulatory Basis
1. cont.	c.) Emissions of VOC from the coatings and thinners used in the flat wood paneling coating process shall be limited to less than 3 tons per consecutive 12-month period <sup>4</sup> .	EU01	Env-A 604.02(a)(1) & Env-A 1214.01
2.	<u>24-hour and Annual Ambient Air Limit</u> The emissions of any RTAP shall not cause an exceedance of its associated 24-hour and annual De minimis level, or 24-hour and annual AAL as set forth in Env-A 1450.01, <i>Table of All Regulated Toxic Air Pollutants</i> .	Facility wide	Env-A 1400 State-only enforceable limitation
3.	<u>Revision of the List of RTAPs</u> In accordance with RSA 125-I:5 IV, if the department revises the list of RTAPs or their respective AALs or classifications under RSA 125-I:4, II and III, and as a result of such revision the owner or operator is required to obtain or modify the permit under the provisions of RSA 125-I or RSA 125-C, the owner or operator shall have 90 days following publication of notice of such final revision in the New Hampshire Rulemaking Register to file a complete application for such permit or permit modification.	Facility wide	Env-A 1404.02 State-only enforceable limitation
4.	<u>Visible Emission Standard</u> The average opacity shall not exceed 20 percent for any continuous 6-minute period. <sup>5</sup>	EU01	Env-A 2103.02

## V. Monitoring and Testing Requirements

The owner or operator is subject to the monitoring and testing requirements as contained in Table 3.

Table 3 – Monitoring and Testing Requirements

Item #	Method of Compliance	Frequency	Applicable Emission Unit	Regulatory Basis
1.	When conditions warrant, the department may require the owner or operator to conduct stack testing in accordance with USEPA or other department approved methods.	Upon request by the department	Facility wide	RSA 125-C:6 XI

## VI. Recordkeeping Requirements

The owner or operator shall be subject to the recordkeeping requirements identified in Table 4.

Table 4 – Recordkeeping Requirements

Item #	Requirement	Duration/Frequency	Applicable Emission Unit	Regulatory Basis
1.	<u>Record Retention and Availability</u> Keep the required records on file. These records shall be available for review by the department upon request.	Retain for a minimum of 5 years	Facility wide	Env-A 902.01(a)

<sup>4</sup> The Facility has the potential to emit VOCs above the RACT applicability threshold pursuant to Env-A 1214, *Flat Wood Paneling Coatings* of 3 tons per consecutive 12-month period. The emission limitation in Table 2, Item 1.c.) is less than this threshold allowing the Facility to opt out of VOC RACT for flat wood paneling coating.

<sup>5</sup> Compliance with visible emission limitations shall be determined, upon request by the department, using 40 CFR 60, Appendix A, Method 9, or other department approved method.

## The Woodworks Architectural Millworks, Inc. – Londonderry

Table 4 – Recordkeeping Requirements

Item #	Requirement	Duration/Frequency	Applicable Emission Unit	Regulatory Basis
2.	<p><u>Regulated Toxic Air Pollutants</u></p> <p>a.) Maintain records documenting compliance with Env-A 1400; and</p> <p>b.) Compliance was demonstrated at the time of permit issuance as described in the department’s Application Review Summary for application #18-0257. The source must update the compliance demonstration using one of the methods provided in Env-A 1405 if:</p> <ol style="list-style-type: none"> <li>1.) There is a revision to the list of RTAPs lowering the AAL or De minimis level for any RTAP emitted from the Facility;</li> <li>2.) The amount of any RTAP emitted is greater than the amount that was evaluated in the Application Review Summary;</li> <li>3.) An RTAP that was not evaluated in the Application Review Summary will be emitted; or</li> <li>4.) Stack conditions change.</li> </ol>	Update prior to process changes and within 90 days of each revision of Env-A 1400	Facility wide	Env-A 902.01(c) State-only requirement
3.	<p><u>Recordkeeping Requirements for Process Operations</u></p> <p>Maintain the following records:</p> <ol style="list-style-type: none"> <li>a.) Total quantity of coating, thinning and cleaning material containing VOCs, HAPs and/or RTAPs; and</li> <li>b.) SDS or other documentation containing the concentration of total VOCs, each HAP, and each RTAP in each coating, thinning and cleaning material used.</li> </ol>	Monthly	EU01	Env-A 902.01(b) & Env-A 903.02
4.	<p><u>Additional Recordkeeping Requirements: Emission Limitations</u></p> <p>Maintain a 12-month running total of the following emissions calculated pursuant to Env-A 705.03 for the purpose of demonstrating that the emissions of these pollutants are below the thresholds specified in Table 2, Item 1:</p> <ol style="list-style-type: none"> <li>a.) Emissions of VOCs;</li> <li>b.) Emissions of VOCs from the coatings and thinners used in flat wood panel coating; and</li> <li>c.) Emissions of HAPs.</li> </ol>	Monthly	EU01	Env-A 906 & Env-A 604.02(a)(3)

## VII. Reporting Requirements

- A. Pursuant to Env-C 203.02(b), *Date of Issuance of Filing*, written documents shall be deemed to have been filed with or received by the department on the actual date of receipt by the department, as evidenced by a date stamp placed on the document by the department in the normal course of business.
- B. All emissions data submitted to the department shall be available to the public. Claims of confidentiality for any other information required to be submitted to the department pursuant to this permit shall be made at the time of submission in accordance with Env-A 103, *Claims of Confidentiality*.

C. The owner or operator shall be subject to the reporting requirements identified in Table 5.

<b>Table 5 – Reporting Requirements</b>				
<b>Item #</b>	<b>Requirement</b>	<b>Frequency</b>	<b>Applicable Emission Unit</b>	<b>Regulatory Basis</b>
1.	<p><u>General Reporting Requirements</u></p> <p>a.) Each report shall be separately and clearly labeled with:</p> <ol style="list-style-type: none"> <li>1.) The name, mailing address and physical address of the source covered by the report;</li> <li>2.) The operating period covered by the report;</li> <li>3.) The permit number and condition or item number that requires the report submittal;</li> <li>4.) The type of report, using the name of the report as specified in the reporting condition in the permit, that is being submitted; and</li> <li>5.) The date the report was prepared;</li> </ol> <p>b.) An owner or operator who submits a report that is a revision to a previously-submitted report shall clearly identify the previously-submitted report with the information specified in a.) above, and indicate which portions of the report have been revised;</p> <p>c.) The owner or operator may submit more than one report with a single cover, provided the owner or operator clearly identifies each report being submitted using the information required in a.) and b.) above, if applicable, for each report; and</p> <p>d.) The owner or operator shall submit reports as paper documents or by electronic means.</p>	For each report submitted to the department	Facility wide	Env-A 907.01
2.	<p><u>Annual Emissions Report</u></p> <p>Submit an annual emissions report which shall include the following information:</p> <p>a.) Actual calendar year emissions of:</p> <ol style="list-style-type: none"> <li>1.) Total VOCs;</li> <li>2.) Each RTAP and each HAP reported by CASRN;</li> </ol> <p>b.) The methods used in calculating such emissions in accordance with Env-A 705.03, <i>Determination of Actual Emissions for Use in Calculating Emission-Based Fee</i>;</p> <p>c.) The emission factors and the origin of the emission factors; and</p> <p>d.) All information recorded in accordance with Table 4, Item 3.a.).</p>	Annually (received by the department no later than April 15 <sup>th</sup> of the following year)	EU01	Env-A 907.02
3.	<p><u>Annual Emission Fee</u></p> <p>Pay annual emission fee in accordance with Condition XI.</p>	Annually (received by the department no later than May 15 <sup>th</sup> of the following year)	EU01	Env-A 705
4.	<p><u>Permit Deviation Reporting Requirements</u></p> <p>Report permit deviations that cause excess emissions in accordance with Condition VIII.B.</p>	As specified	EU01	Env-A 911.04(a)
5.	<p><u>NESHAP Reporting Requirement</u></p> <p>The owner or operator shall notify USEPA Region 1 that they are no longer subject to 40 CFR 63 subpart QQQQ due to acceptance of federally enforceable limits on HAP emissions to below the major source thresholds specified in Table 2, Item 1.b.).</p>	Within 15 days of issuance of this permit	EU01	40 CFR 63.9(j) Subpart A

## VIII. Permit Deviation Reporting Requirements

### A. Env-A 101, *Definitions*:

1. A *permit deviation* is any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in either a Title V permit, state permit to operate, temporary permit or general state permit issued by the department.
2. An *excess emission* is an air emission rate that exceeds any applicable emission limitation.
3. An *emission limitation* means "emission limitation" as defined in section 302(k) of the Act, namely "a requirement established by the State or the Administrator which limits the quantity, rate, or concentration of emissions of air pollutants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice or operational standard promulgated under this Act." This term includes "emission standard".

### B. Env-A 911.04, *Reporting Requirements*: In the event of a permit deviation that causes excess emissions:

1. Notify the department of the permit deviation and excess emissions by telephone (603-271-1370), fax (603-271-7053) or e-mail (pdeviations@des.nh.gov), within 24 hours of discovery of the permit deviation, unless it is a Saturday, Sunday, or state legal holiday, in which event, the department shall be notified on the next day which is not a Saturday, Sunday, or state legal holiday; and
2. Submit a written report of the deviation on paper or by electronic means to the department within 10 days of discovery of the permit deviation reported above. The report shall include all of the following information:
  - a. Facility name;
  - b. Facility address;
  - c. Name of the responsible official;
  - d. Facility telephone number;
  - e. A description of the permit deviation, including the applicable permit number and permit condition(s);
  - f. The probable cause of the permit deviation;
  - g. The date and time of the discovery of the permit deviation;
  - h. The actual date(s) and time(s) of the permit deviation;
  - i. The duration of the permit deviation, including the date and time that the device, process or air pollution control equipment returned to operation in compliance with an enforceable emission limitation or operating condition;
  - j. The specific device, process or air pollution control equipment that contributed to the permit deviation;
  - k. Any corrective measures taken to address the permit deviation;
  - l. Preventative measures taken to prevent future permit deviations;
  - m. The type and amount of any excess emissions that occurred as a result of the permit deviation if applicable; and
  - n. If applicable, the calculation or estimation used to quantify the excess emissions.

**IX. Permit Amendments****A. Env-A 612.01, *Administrative Permit Amendments:***

1. An administrative permit amendment includes the following:
  - a. Corrects typographical errors;
  - b. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - c. Requires more frequent monitoring or reporting; or
  - d. Allows for a change in ownership or operational control of a source provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the department.
2. The owner or operator may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request with the department.

**B. Env-A 612.03, *Minor Permit Amendments: Temporary Permits and State Permits to Operate:***

1. The owner or operator shall file with the department a request for a minor permit amendment for any proposed change to any of the conditions contained in this Permit which does not qualify as either an administrative or significant amendment.
2. The request for a minor permit amendment shall be in the form of a letter to the department and shall include the following:
  - a. A description of the proposed change; and
  - b. A description of any new applicable requirements that will apply if the change occurs.
3. The owner or operator may implement the proposed change immediately upon filing a request for the minor permit amendment, but shall be subject to enforcement if the department later determines that the change violated any applicable state or federal requirement.

**C. Env-A 612.04, *Significant Permit Amendments: Temporary Permits and State Permits to Operate:***

1. The owner or operator shall submit a written request for a permit amendment to the department prior to the implementation of any proposed change which meets one of the following:
  - a. Any proposed change that results in the following:
    - i. Any increase in allowable hourly or annual emissions of NO<sub>x</sub>, SO<sub>2</sub>, VOCs, HAPs, or PM<sub>10</sub>; or
    - ii. Any increase in potential emission equal to or greater than 5 lb/hr of CO; or
  - b. Any proposed change to operating or emission limitations.
2. A request for a significant permit amendment shall include the following:
  - a. A complete application form, as described in Env-A 1703 through Env-A 1708, as applicable;
  - b. A description of:
    - i. The proposed change;
    - ii. The emissions resulting from the change;



- iii. Any new applicable requirements that will apply if the change occurs; and
  - c. Where air pollution dispersion modeling is required for a device pursuant to Env-A 606.02, the information required pursuant to Env-A 606.04.
  - d. A description of the monitoring the source intends to conduct to demonstrate compliance with all applicable state and federal statutes, rules and permits, as specified in Env-A 810.02.
3. The owner or operator shall not implement the proposed change until the department issues the amended permit.

## X. Inspection and Entry

Department personnel shall be granted access to the facility covered by this permit, in accordance with RSA 125-C:6, VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement found in the New Hampshire Rules Governing the Control of Air Pollution and/or conditions of any permit issued pursuant to Chapter Env-A 600.

## XI. Baseline and Emission-Based Fee Requirements

- A. Env-A 705.02, *Emission-based Fee*: The owner or operator shall pay to the department each year an annual emission fee consisting of an emission-based fee calculated pursuant to Condition XI.C and a baseline emission fee stated in Condition XI.D. The owner or operator shall submit, to the department, payment of the annual emission fee so that the department receives it on or before May 15th for emissions during the previous calendar year. For example, the fees for calendar year 2019 shall be received on or before May 15, 2020.
- B. Env-A 705.03, *Determination of Actual Emissions for use in Calculating of Emission-based Fee*: The owner or operator shall determine the total actual annual emissions from the emission units listed in Table 1 for each calendar year in accordance with the methods specified in Env-A 705.03.
- C. Env-A 705.04, *Calculation of Emission-based Fee*: The owner or operator shall calculate the annual emission-based fee for each calendar year in accordance with the procedures specified in Env-A 705.04 and the following equation:

$$FEE = E * DPT$$

Where:

- FEE = The annual emission-based fee for each calendar year as specified in Env-A 705;
- E = Total actual emissions as determined pursuant to Condition XI.B; and
- DPT = The annual fee, in dollars per ton of emissions, determined by the department in accordance with Env-A 705.04<sup>6</sup>

- D. Env-A 705.06, *Payment of Annual Baseline Emission Fee*: In addition to the annual emission-based fee, the owner or operator shall pay to the department each year an annual baseline emission fee pursuant to the following:
  - 1. Env-A 705.06(a), \$750; or
  - 2. Env-A 705.06(c), if the owner or operator is not required to pay an emission-based fee for any calendar year because the Facility had zero emissions, the annual baseline emission fee shall be \$500 in lieu of the fee stated in Condition XI.D.1.

<sup>6</sup> For additional information on emission-based fee, visit the DES website at <http://des.nh.gov/organization/divisions/air/pehb/apps/fees.htm>.