



COUNTY NUMBER: **069**

SOURCE NUMBER: **0125**

DATE OF INSPECTION: **January 27, 2020**

DATE REPORT SUBMITTED: **February 14, 2020**

COUNTY: **Larimer**

INSPECTOR: **M. Hansen and J. Royer**

COMPANY: **Alpine Cabinet Co.**

SITE LOCATION: **4125 Main Street, Timnath, Colorado 80547**

MAILING ADDRESS: **Same as above.**

CONTACT PERSON: **Bill Chinn**

TIME: **10:00AM**

TELEPHONE NO.: **970-484-9030**

EMAIL: **BillC@alpinecabinetco.com**

PERMIT NO.: **08LR0955**

SOURCE CLASS: Major SM-80 Syn Minor Minor

INSPECTION TYPE: Full Compliance Evaluation Onsite Evaluation
Partial Compliance Evaluation Offsite Evaluation

Additional Inspection Records in File? Yes No

HOURS: Travel & Prep: **2.5** Inspection: **1.5** Report: **4.0** Total: **8.0**

COMPLIANCE STATUS: IN COMPLIANCE OUT OF COMPLIANCE

INTRODUCTION

Alpine Cabinet Co. manufactures wooden cabinets from raw materials of hardwood and sheets of plywood, particle board, and laminate materials which are assembled, stained, and painted onsite prior to being transported offsite for sales and distribution.

A routine compliance inspection was conducted on January 27, 2020. Mr. Bill Chinn, Alpine Cabinet’s Vice President of Manufacturing, escorted Ms. Hansen and Ms. Jessica Royer of Larimer County Department of Health and Environment throughout the facility. Mr. Chinn provided information and records necessary to determine compliance with Alpine Cabinet Co. Construction Permit 08LR0955 issued as Issuance 2 on December 4, 2015.

POINT AIRS ID/PERMIT NUMBERS

THE SOURCE TO WHICH THIS PERMIT APPLIES IS DESCRIBED AND LOCATED AS FOLLOWS:

Cabinet manufacturing facility, known as Alpine Cabinet Co., located at 4125 Main Street, Timnath in Larimer County.

THE SPECIFIC EQUIPMENT OR ACTIVITY SUBJECT TO THIS PERMIT INCLUDES THE FOLLOWING:

Facility Equipment ID	AIRS Point	Description
Paint Booths and Gluing Operations	001	<p>One (1) surface coating spray booth, measuring 93” wide x 78” high x 78” deep, for application of stains. This is equipped with exhaust filters for the control of emissions of particulate matter due to overspray.</p> <p>One (1) surface coating spray booth, measuring 93” wide x 78” high x 84” deep, for application of first coat. This is equipped with exhaust filters for the control of emissions of particulate matter due to overspray.</p> <p>One (1) surface coating spray booth, measuring 93” wide x 78” high x 84” deep, for application of second coat. This is equipped with exhaust filters for control of emissions of particulate matter due to overspray.</p> <p>Assembly of wood components by gluing. Glues contain Volatile Organic Compounds.</p>
Woodworking Operations	005	Woodworking activities. Equipment: saws, planers, slotters, routers, milling machines, sanders, buffers, etc. Particulate matter emissions are collected by a central vacuum collection system and vented into the work area after the collection of the dust in a high efficiency cyclone. Cyclone outlet gas is vented into the working area.

SOURCE COMPLIANCE HISTORY

No violations or enforcement actions have been associated with this source.

NSPS/NESHAP/MACT APPLICABILITY

Not applicable.

REPORTS

No compliance reports were submitted or required during the compliance period.

MALFUNCTION REPORT REVIEW

No malfunctions were reported.

COMPLIANCE ASSISTANCE/SOURCE ACTIONS

No compliance assistance was requested and/ or provided to the source.

PERMIT CONDITIONS AND COMPLIANCE STATUS

Permit 08LR0955 Issuance 2

Dated December 4, 2015

REQUIREMENTS TO SELF-CERTIFY FOR FINAL APPROVAL

1. This construction permit represents final permit approval to operate this emissions source. Therefore, it is not necessary to self-certify. (Regulation 3, Part B, Section III.G.5).

Self-Certification not required. In compliance.

EMISSION LIMITATIONS AND RECORDS

2. Emissions of air pollutants shall not exceed the following limitations (as calculated using the emission factors included in the Notes to Permit Holder section of this permit). Annual records of the actual emission rates shall be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation No. 3, Part B, Section II.A.4)

Annual Limits:

Facility Equipment ID	Airs Point	TSP Tons/yr	PM ₁₀ Tons/yr	PM _{2.5} Tons/yr	NO _x Tons/yr	SO ₂ Tons/yr	VOC Tons/yr	CO Tons/yr	Emission Type
Painting and gluing	001	0.26	-	-	-	-	22.0	-	Point
Woodworking	005	7.5	3.0	3.0	-	-	-	-	Point
TOTAL	Point	7.76	3.0	3.0	-	-	22.0	-	
Actual 2019		3.18	1.27	1.27			7.9		

In compliance

Source provided annual records for review upon request. In compliance.

PROCESS LIMITATIONS AND RECORDS

3. This source shall be limited to the following maximum consumption, processing and/or operational rates as listed below. Annual records of the actual process rate shall be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation 3, Part B, II.A.4)

PROCESS AND CONSUMPTION LIMITS

Facility Equipment ID	Airs Point	Process Parameter	Annual Limit
Painting and Gluing	001	Volatile Materials Usage	Shall be limited by the VOC emission limits above.
Woodworking	005	Throughput of lumber and flat goods	1,500,000 BF/yr

VOC emissions for 2019 annual usage is below the 22.0 tons/yr limitation. Annual total VOC for 2019 was 7.9 tons due to product change with lower VOC. In compliance

Total board feet for 2019 was 637,240ft. This is 42.48% of the allowable. In compliance

Alpine is required to control particulate emission from the surface coating operations. Each of the surface coating booths had filtration systems capable of capturing and controlling overspray and no evidence of paint overspray was observed. All 3 paint booths were in operation at the time of inspection. Alpine also reported that they now use solvents with lower volatile content and are still able to maintain a quality product.

Source provided annual records for review upon request. In compliance.

4. The emission points in the table below shall be maintained and operated with the control equipment as listed. The emission control devices shall be inspected, monitored, maintained / renewed, and operated as per the manufacturers’ recommendations, or maintained in accordance with good air pollution control practices to ensure the satisfactory performance of the devices. (Reference: Regulation Number 3, Part B, Section III.E.)

AIRS Point	Control Device	Controlled Pollutants
005	Vacuum collection system and cyclone	TSP, PM ₁₀ , PM _{2.5}

Vacuum collection system and cyclone are inspected, monitored, maintained/ renewed, and operated as per the manufacturers' recommendations, and maintained in accordance with good air pollution control practices to ensure the satisfactory performance of the devices. No visible emissions observed during the inspection. In compliance.

STATE AND FEDERAL REGULATORY REQUIREMENTS

5. Visible emissions shall not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment visible emissions shall not exceed 30% opacity for more than six minutes in any sixty consecutive minutes. Opacity shall be determined using EPA Method 9. (Reference: Regulation No. 1, Section II.A.1. & 4.)

The particulate emissions produced from sawing, shaping, and sanding wood used in the manufacturing process, identified as AIRS ID 005, are collected from workstations and process equipment and routed to a central dust handling system controlled by a high efficiency cyclone. The manufacturing processes were operating during the inspection and no visible emissions were noted from the cyclone exhaust. Alpine diverts the cyclone exhaust inside the production facility during cold weather to conserve heat, or outside during warm weather. The discharge of the cyclone deposits sawdust through a rotating check-valve into a waste container outside. The waste container has been modified and is enclosed by plastic material. There was a slight breeze during the inspection. No visible emissions were noted during the inspection. In compliance.

6. This source is subject to the odor requirements of Regulation No. 2. (State only enforceable)

Very faint odors consistent with paint spray operations were noted during the inspection inside the building, no odors were noted outside on the property line. No measurable concentrations were noted. In compliance.

7. This source is located in an ozone non-attainment or attainment-maintenance area and subject to the Reasonably Available Control Technology (RACT) requirements of Regulation Number 3, Part B, III.D.2. Condition 9 was determined to be RACT for this source, with no further controls due to the large cost per ton of VOC removed. The applicant shall constantly look for new products and equipment suitable for the operations to minimize the emissions. Records of such product and equipment identification, and corresponding changes made at the facility shall be maintained at the site and made available to the Division for inspection upon request. Any request for an increase in VOC limit shall be accompanied by a RACT analysis, including cost effective analysis, and the proposed RACT.

Alpine reported that they now use solvents with lower volatile content and are still able to maintain a quality product. In compliance.

8. This source is subject to the requirements of Regulation No. 7.V. regarding Disposal of Volatile Organic Compounds as follows: a. No person shall dispose of volatile organic compounds by evaporation, or spillage unless RACT is utilized. (Regulation No. 7.V A)

No evidence of improper solvent use, storage, or evaporation was observed during the inspection. Containers had tight fitting lids, solvent cloths were stored in covered containers. Dirty solvent is stored and picked up by Alpine employs emission controls and consistent good housekeeping required by RACT. Source is in compliance with this condition at time of inspection.

9. This source is subject to the Regulation to Control Emissions of Volatile Organic Compounds, Regulation No. 7, Part IX. as follows: i. Control techniques and work practices shall be implemented at all times to reduce volatile organic compound (VOC) emissions from fugitive sources.

A. Control techniques and work practices include but are not limited to (7.IX.A.7.a.):

- i. tight-fitting covers for open tanks (IX.A.7.a.(1).
- ii. covered containers for solvent wiping cloths (IX.A.7.a.(2).
- iii. proper disposal of dirty clean-up solvent (IX.A.7.a.(3).

B. Emissions of organic material released during clean-up operations, disposal, and other fugitive emissions shall be included when determining total emissions; unless the source owner or operator documents that the VOCs are collected and disposed of in a manner that prevents evaporation to the atmosphere.

C. This source is subject to the requirements of Regulation No. 7. IX.A.8 regarding Recordkeeping, Reporting, and Monitoring provisions and the source shall comply with the requirements of 7.IX.A.8.a., b. and c. as applicable.

Process does not have dirty clean up solvent left over. Last time solvent was disposed of was in 2014 at the hazardous waste site at the Larimer County Landfill. Process changes have taken place since then. In compliance

OPERATING & MAINTENANCE REQUIREMENTS

10. This source is not required to follow a Division-approved operating and maintenance plan.

This facility practices RACT in its operation. Equipment is maintained and cleaned on a regular basis according to the manufacturer specifications. In compliance.

COMPLIANCE TESTING AND SAMPLING

Periodic Testing Requirements

11. Periodic testing is not required for this source.

Noted, In compliance.

ADDITIONAL REQUIREMENTS

12. All previous versions of this permit are cancelled upon issuance of this permit.

Most recent permit is 08LR0955 Issuance 2 dated December 4, 2015. In compliance.

13. The permit number and AIRS ID number shall be marked on the subject equipment for ease of identification. (Reference: Regulation No. 3, Part B, III.E.) (State only enforceable)

Permit number and AIRS ID are labeled on equipment. In compliance.

14. A Revised Air Pollutant Emission Notice (APEN) shall be filed: (Reference: Regulation No. 3, Part A, Section II.C.)

a. Annually whenever a significant increase in emissions occurs as follows:

For any criteria pollutant:

For sources emitting less than 100 tons per year, a change in actual emissions of five tons per year or more, above the level reported on the last APEN submitted; or

For volatile organic compounds (VOC) and nitrogen oxide (NO_x) sources in an ozone non-attainment area emitting less than 100 tons of VOC or nitrogen oxide per year, a change in actual emissions of one ton per year or more or five percent, whichever is greater, above the level reported on the last APEN submitted; or

For sources emitting 100 tons per year or more of a criteria pollutant, a change in actual emissions of five percent or 50 tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

For sources emitting any amount of lead, a change in actual emissions, above the level reported on the last APEN submitted, of fifty (50) pounds of lead

For any non-criteria reportable pollutant:

If the emissions increase by 50% or five (5) tons per year, whichever is less, above the level reported on the last APEN submitted to the Division.

b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
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c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment; or

d. Whenever a permit limitation must be modified, or e. No later than 30 days before the existing APEN expires.

Alpine Cabinets is aware of the requirements and tracks emissions. Sans trigger, APEN is due on or before November 4, 2020. In compliance.

CONCLUSION

Based upon the inspection, review of records, and information provided by the source, this site is found to be in compliance with permit conditions and exemption requirements.