



NON-TITLE V TECHNICAL SUPPORT DOCUMENT

PERMIT NUMBER: 040172
BUSINESS NAME: Legends Furniture Inc
SOURCE TYPE: Wood Furniture Manufacturing
PERMIT ENGINEER: Robert Tate

App. ID(s):	401954
Revision(s):	2.0.0.0
Revision Type(s):	Renewal
Date Prepared:	01/27/2016

BACT: Yes **MACT:** No **NSPS:** No **SYNTH MINOR:** Yes **AIRS:** Yes
DUST PLAN REQUIRED: No **DUST PLAN RECEIVED:** No
O&M PLAN REQUIRED: Yes **O&M PLAN RECEIVED:** Yes
PORTABLE SOURCE: No **SITE VISIT:** Yes

PROCESS DESCRIPTION:

The process involves the coating of wood furniture and fixtures. Raw material wood and wood products are maintained in the storage area. From there material is sent to the mill area where woodworking operations are performed to ready the wood for assembly and spray coating. The particulate matter created by these operations is captured and directed via forced air draft created by the baghouse blower to the baghouse for the removal of particles. The wood material passes to the assembly and finish area before moving onto the spray coating area. There are spray booths numbered 1 through 8 equipped with spray guns, blowers and and filters through which captured air containing overspray particles, VOC and HAP are directed and emitted to the atmosphere. Emissions from these operations are particulate matter from wood working and spray coating, VOC and HAP from the spray coating.

The facility was subject to BACT resulting from their emissions of 45 tons VOC/year in a prior permit 1.0.2.0 and the immediately prior non-minor revision 1.1.0.0 was solely for the purpose of increasing its VOC emissions from 45 tons/yr to 75 tons/yr and does not include any changes in equipment or any change in the allowable emissions for PM10, single HAP, or total HAP. Because this increase once again triggers BACT, a top-down BACT Analysis was included in the non minor revision 1.1.0.0 and is brought forward to this renewal in Section G. BACT ANALYSIS.

The process for this renewal is the same as it was for the non-minor revision 1.1.0.0 and the information presented there is included in this renewal.

PERMIT HISTORY:

Date Received	Revision Number	Description
04/13/2005	0.0.0.0	Submitted application 270914 for a new permit for wood furniture manufacturing/coating. Prior to this submittal the source had been permitted under Title V99010
11/23/2005	0.0.1.0	Submitted application 314944 minor modification to widen spray booth #7, add an internal dust control booth, and add a 30 HP beam saw.
05/18/2007	0.0.2.0	Submitted application 366061 to add spray booth #9.
10/27/2009	1.0.0.0	Submitted application 379921 for renewal of permit.
07/21/2010	1.0.1.0	Submitted application 385653 to vent spray booth which was previously approved to the outside ambient air. The booth is equipped with a 7.5 HP blower motor rated at 22,500 cfm.
03/18/2013	1.0.2.0	Submitted application 396145 to eliminate the monthly VOC emissions from permit condition 22 because facility is already subject to BACT.
07/16/2013	1.1.0.0	Submitted application 397626 to increase the emissions of VOC from 45 tons/yr to

		75 tons/yr which again triggers BACT including a top-down BACT analysis.
12/17/2015	2.0.0.0	Submitted application 401954 for renewal of permit. The application indicated that (1) there are no changes in the operations from the current permit, (2) there are no new or modified sources or control equipment from that defined in the current permit, (3) that there are no emissions present that were not correctly identified in the current permit, (4) that there are no changes that trigger any new applicable requirements and (5) that there has not been a change in ownership since the permit was last issued.

PURPOSE FOR APPLICATION:

Submitted application 401954 for renewal of permit.

A. APPLICABLE COUNTY REGULATIONS:

- Rule 100: General Provisions and Definitions
- Rule 200: Permit Requirements
- Rule 220: Non-Title V Permit Provisions
- Rule 241: BACT
- Rule 280: Fees: Table A (Subject to BACT)
- Rule 300: Visible Emissions
- Rule 315: Spray Coating
- Rule 342: Spray Coating Wood Furniture and Fixtures

B. APPLICABLE FEDERAL REGULATIONS:

40 CFR 63, Subpart QQQQ applies to wood coating building products but doesn't apply to coating wood furniture.

40 CFR 63, Subpart HHHHHH for area sources applies to coating and stripping of metal and plastic parts but doesn't apply to coating wood furniture .

There are no federal regulations that apply to the spray coating of wood furniture.

C. AIR POLLUTION CONTROL EQUIPMENT/EMISSION CONTROL SYSTEM(s):

System description	Quantity	Comments:
Baghouse	1	O &M Plan revised November 10, 2004 and approved in October 2005.

D. EMISSIONS:

Following in the APPENDIX is the presentation by the source of the calculation procedure demonstrating the emissions from the operations when operating near the 75 ton VOC per rolling 12 months proposed allowable limit. These calculations were presented in the prior non-minor permit revision and are brought forward "as is" for this renewal 2.0.0.0 because the operations remain the same.

In the table immediately below is a summary of those emissions.

Pollutants	Twelve Month Rolling Total Emission Limits (lbs)
Particulate Matter <10 Micron Diameter (PM ₁₀)	665.1
Particulate Matter <2.5 Micron Diameter (PM _{2.5})	665.1
Volatile Organic Compounds (VOC)	149,900.53
Single HAP	1,669.47
Total Hazardous Air Pollutants (HAP)	1,707.31

E. HAP EMISSION IMPACTS:

Based on the information provided in the permit application, the majority of the HAP is toluene (approximately 1,669 lbs/yr) with approximately one half the amount emitted from stack number 4 and one half from stack number 8. Several different SCREEN modeling scenarios were tested with the following giving the greatest concentrations of the pollutant in the ambient air:

***** AREACIRC PARAMETERS *****

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SOURCE EMISSION RATE:          0.0239 g/s          0.190 lb/hr

AREA EMISSION RATE:           0.670E-02 g/(s-m2)       0.531E-01 lb/(hr-m2)
AREACIRC HEIGHT:              12.50 meters          41.00 feet
AREACIRC RADIUS:              1.07 meters          3.50 feet
INITIAL VERTICAL DIMENSION:   12.50 meters          41.01 feet
RURAL OR URBAN:              URBAN
POPULATION:                   3000000

INITIAL PROBE DISTANCE =      25. meters          82. feet
  
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***** AERSCREEN MAXIMUM IMPACT SUMMARY *****

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3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance
  
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CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	122.0	122.0	122.0	122.0	N/A
DISTANCE FROM SOURCE	15.24 meters				
IMPACT AT THE AMBIENT BOUNDARY	122.0	122.0	122.0	122.0	N/A
DISTANCE FROM SOURCE	15.24 meters				

The above results yield acute and chronic levels of toluene in the ambient air well below the values in County Rule 372 §306.3, Table 3 of 1,923 mg/m³ and 5.21 mg/m³, respectively.

F. PERFORMANCE TESTING:

No performance testing is required under this permit.

G. BACT ANALYSIS

Permit 1.0.2.0, at its 45 tons VOC/yr emission rate limit, satisfied BACT requirements by using coatings with VOC content less than the limits found in the California South Coast Air Quality Management District Rule 1136, Coating VOC Limitations. The increase in VOC emissions from 45 tons VOC/yr to 75 tons VOC/yr requested under the non-minor revision 1.1.0.0 again triggered the requirement for BACT compliance and raises the question as to whether or not satisfaction of the BACT requirements at 45 tons VOC/yr satisfies the BACT requirements at 75 tons VOC/yr. To respond to that question a Top-Down BACT Analysis was performed by the source considering a catalytic oxidizer and two thermal oxidizers, a recuperative and a regenerative, all of which are common VOC controls and the use of extremely low VOC content coating materials.

For any BACT determination, the controls must be shown to be both technologically and economically feasible.

The use of a catalytic oxidizer is not considered to be technologically feasible due, in part, to catalyst contamination issues with the use of wood products coating. Also the use of extremely low VOC content coating materials are not considered to be technologically feasible because of the climate conditions in Maricopa County, i.e., high summer time temperatures and very low humidity.

An economic feasibility analysis was conducted on the recuperative and the regenerative oxidizers utilizing the US EPA Air Pollution Control Cost Manual, EPA/452/B-02-001, Section 3.2 VOC Destruction Controls, September 2000. Following is a somewhat abbreviated version of the calculation procedure; however, the application materials contain all the details of that process.

The costs for the Thermal – Recuperative oxidizer were based on information from the manual for the low rate range of 500 to 50,000 scfm, (See graph of cost versus flow rate in Figure 2.4, page 2-37). The specific flow for the source was determined to be 22,500 cfm/booth and with that as the starting point the evaluation proceeded in accordance with the manual method as shown in Table 8, page 2-42. The total capital investment of such a unit was found to be \$496,579 in 1988 dollars with a current dollar value of 1.97 (Consumer Price Index Factor) times the 1988 value to yield a current total capital investment of \$978,261.

The direct annual costs at 8,000 hours/yr of operation includes operating labor and materials, maintenance labor and materials and utilities of natural gas and electricity is determined to be \$771,513.

The total indirect annual cost includes overhead, administrative charges, property taxes, insurance and capital recovery (the capital recovery factor, CRF, is a function of the equipment life, i.e. 10 years and the opportunity cost of the capital, i.e. interest rate). Therefore, for a 10 year equipment life and 8% interest the CRF is found to be 0.14903. That number times the total capital cost of \$978,261 yields the total indirect annual cost to be \$194,340. The sum of the total direct annual costs and the total indirect annual cost equals \$965,853. The spray booth emissions were determined to be 9.375 tons(average)/yr/spray booth. On that basis the cost of the thermal recuperative oxidizer per ton of VOC reduced would be $\$965,853/9.375 \text{ tons VOC reduced/yr} = \$103,024$.

Based on Bay Area Air Quality BACT Workbook and Implementation Procedure, the maximum feasible costs for wood products coating is \$13,750/ton VOC reduced to satisfy BACT requirements. The costs in this analysis substantially exceed the BACT requirement and the use of such equipment would not be considered economically feasible.

A similar analysis was conducted for the Thermal – Regenerative based on the flow rate range in the manual of 10,000 to 100,000 scfm, (See graph of costs versus flow rate in Figure 2.5, page 2-38). The specific flow for the source was determined to be 45,000cfm/two booths. The total direct and indirect capital investment of such a unit is found to be \$1,424,850 in 1999 dollars with a current dollar value of 1.40 (Consumer Price Index Factor) times the 1999 value to yield a current total capital investment of \$1,994,790.

As for the recuperative oxidizer the regenerative oxidizer total direct and indirect annual cost were determined to be \$823,265. This value divided by the flow rate of 18.75 tons VOC/yr ($823,265/18.75$) yields the value of \$43,907/ton VOC reduced

Again based on the above referenced Bay Area Procedure, the maximum feasible costs for wood products coating is \$13,750/ton VOC reduced. Therefore, the above determined costs of \$43,907 substantially exceed the BACT requirement and the use of such equipment would not be considered economically feasible.

That being the case, the source is proposing a continuation of the use of the low VOC standards in its current permit to continue to satisfy BACT requirements for the non minor revision 1.1.0.0 and now the renewal 2.0.0.0.

It was agreed that the source's proposal to continue with the VOC limits from the prior permit would be acceptable along with the addition of the 40 CFR 63, Subpart JJ Work Practice Standards and Operator Training to the permit, to satisfy the BACT requirements. Those provisions are included in the permit.

H. REGULATORY REQUIREMENTS AND MONITORING:

Permit Conditions 1 – 10 were taken from the prior permit and updated using the current Sharepoint Coating wood Furniture and Fixtures template and revised for specific application to the source's operations. In particular the conditions related to VOC limits and Work Practice Standards that represent BACT are included in the permit

in addition to the current template conditions.

Permit Conditions 11 – 14 were taken from the prior permit and updated using the current Sharepoint Woodworking template and revised for specific application to the sources operations.

Permit Conditions 15 – 21 were taken from the current Sharepoint General Conditions template without revision.

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APPENDIX

Emission Calculations

I. Projected Overspray PM10, VOC and VHAP Emissions

See the APPENDIX Page 6 of 9 which lists the materials used, and estimates the VOC emissions, Solids sprayed, and Overspray Solids emissions for the facility when operating near the 75 tons per rolling 12-months proposed allowable VOC limit. The spray booth filter manufacturer's removal efficiency specification sheet was included in the application. The APPENDIX Page 7 of 9 list the materials used and the weight fraction of the individual HAP in those materials. The APPENDIX Page 8 of 9 lists the materials used and estimates the individual and total HAP emissions form those materials. **Total projected VOC emissions = 149,900.53 lbs/Rolling 12 month period and the total projected HAP emissions = 1,707.31 lbs/Rolling 12 month period. Total projected overspray PM10 emissions = 354.8 lbs/Rolling 12 month period .**

II. Projected Wood PM10 Emissions

Each factor for PM10 emissions was obtained from the MCAQD Inventory help sheet for the woodworking industry. A woodworking machinery list is included with this application. The facility estimates it would generate approximately 163.3 tons per year of wood waste at the proposed rolling 12-month allowable voc limit. In accordance with SCC 30788801, 100 lbs of wood waste per ton is PM10. The 163.3 tons of wood waste would calculate to be 16,330 lbs of PM10. **Following the help sheet guidelines [1.0 - (100.00% - 99.9%)], the direct PM10 emissions is calculated to be 16.3 lbs per year.** The baghouse filter manufacturer's removal efficiency specification sheet was included in the application.

In actuality, the wood waste container is covered during operations precluding fugitive wood waste emissions. Notwithstanding, using SCC 30703001 and 30703003 at 0.58 and 1.2 lbs of PM10 per ton of wood waste, respectively. **The fugitive calculations are as follows:**

Storage Bin Emissions (lbs PM10 per year) = 0.58 X 163.3 = 94.7

Bin Loadout Emissions (Lbs PM10 per year) = 1.2 X 163.3 = 196.0

Legends uses and has had permitted a wood dust control booth for blowing off wood dust prior to finishing. The efficiency of the dust blow off filters is 93.8%. At the proposed voc limit, Legends estimates that 1,062 lbs of wood dust would be generated in a 12 month period. **The PM10 emissions would be 1,062 * 0.05 * (1.0 - 0.938) = 3.3 lbs.**

Total Wood Emissions (Lbs PM10 per year) = 16.3 + 94.7 + 196 + 3.3 = 310.3

III. Projected Total PM10 Emissions

**Total Facility PM10 (Lbs per year) = Particulate Overspray + Wood Dust
= 354.8 + 310.3 = 665.1**

IV. Estimated Calendar Year 2012 Wood Dust PM10 Emissions

Each factor for PM10 emissions was obtained from the MCAQD Inventory help sheet for the woodworking industry. The facility generated approximately 81.67 tons of wood waste in calendar year 2012. In accordance with SCC 30788801, 100 lbs of wood waste per ton is PM10. The 163.3 tons of wood waste is calculated to be 8,167 lbs of PM10. **Following the help sheet guidelines (1.0 - (100.00% - 99.9%)), the direct PM10 emissions is calculated to be 8.17 lbs per year.** In actuality, the wood waste container is covered during operations precluding fugitive wood waste emissions. Notwithstanding, using SCC 30703001 and 30703003 at 0.58 and 1.2 lbs of PM10 per ton of wood waste, respectively. **The fugitive calculations are as follows:**

Storage Bin Emissions (lbs PM10 per year) = 0.58 X 81.67 = 47.4

Bin Loadout Emissions (Lbs PM10 per year) = 1.2 X 81.67 = 98.0

Legends uses and has had permitted a wood dust control booth for blowing off wood dust prior to finishing. The efficiency of the dust blow off filters is 93.8%. Legends estimates that 531 lbs of wood dust was generated in calendar year 2012. **The PM10 emissions would be 531 * 0.05 * (1.0 - 0.938) = 1.6 lbs.**

Total Wood Emissions (Lbs PM10 per year) = 8.17 + 47.4 + 98 + 1.6 = 155.2

V. Actual 12 Month Rolling Annual Total for Calendar Year 2012: VOC = 76,934 lbs; HAP = 34 lbs

APPENDIX

VOC EMISSIONS AND SOLIDS SPRAYED

Finishing Material Description	Finishing Material Code (EDS)	Material Usage (gal)	Total Density (Lbs/Gal)	VOC Density (Lbs /Gal)	Solids Density (Lbs /Gal)	Spray Booth	VOC Emission (Lbs)	Solids Sprayed (Lbs)
Acetone	Acetone	4,604.00	6.59	0.00	0.00	SB4,8	0.00	0.00
Butyl Oxitol	Butyl Oxitol	370.00	7.51	7.51	0.00	SB4,8	2,778.70	0.00
Ester Solvent	EEP	270.00	7.91	7.91	0.00	SB4,8	2,135.70	0.00
142 Solvent	142H	214.00	6.50	6.50	0.00	SB2,6	1,391.00	0.00
Black Sealer	T65XXB20137	3,021.00	7.28	1.62	1.48	SB2,6	4,894.02	4,471.08
CLQ Wiping Stain	S64XXR16670	6,526.00	7.14	2.57	2.09	SB2,6	16,771.82	13,639.34
FLQ Fruitwood	S64XXN15503	1,255.00	7.03	2.32	1.89	SB2,6	2,911.60	2,371.95
Amaretto NGR	S61XXN19085	6,294.00	6.78	0.83	0.13	SB1,5	5,224.02	818.22
Grand View NGR	S61XXN26024	800.00	6.64	0.37	0.02	SB1,5	296.00	16.00
Vinyl Sealer	T67FV0006	21,900.00	7.37	1.95	1.71	SB3,7	42,705.00	37,449.00
Summer Lacquer	T75FV0037	23,500.00	7.34	1.73	1.62	SB4,8	40,655.00	38,070.00
Burnt Umber WS Concentrate	S64N37	5.00	9.65	4.06	5.55	SB2,6	20.30	27.75
Mocha NGR	S61XXN19713	8,667.00	6.75	0.43	0.24	SB1,5	3,726.81	2,080.08
Mocha WS	S64XXN19714	8,874.00	7.22	2.71	2.26	SB2,6	24,048.54	20,055.24
Legends Brown Cherry NGR	S61XXN22171	1,651.00	6.81	0.92	0.13	SB1,5	1,518.92	214.63
White Primer	P65XXW26234	400.00	8.23	0.52	2.56	SB2,6	208.00	1,024.00
Legends Low VOC White	T75XXW26294	100.00	8.24	2.79	2.30	SB2,6	279.00	230.00
White	T70XXW26668	58.00	7.69	1.87	2.06	SB2,6	108.46	119.48
Home Depot Cans	15X016 (Cans)	449.00	0.73	0.51	0.22	SB2,6	227.64	98.78
		88,958.00					149,900.53	120,685.55
		NGR Overspray PM10 Emissions (lbs/Year) = (3,128.93)*(1.0-0.65)*(1.0-0.981) = 20.8						
		Wiping Stain Overspray PM10 Emissions (lbs/Year) = (42,037.62)*(1.0-0.4)*(1.0-0.997) = 75.7						
		Sealer Overspray PM10 Emissions (lbs/Year) = (37,449)*(1.0-0.4)*(1.0-0.9943) = 128.1						
		Topcoat Overspray PM10 Emissions (lbs/Year) = (38,070)*(1.0-0.4)*(1.0-0.9943) = 130.2						
		Total Facility Wide Overspray PM10 Emissions (Lbs/Year) = 354.8						
		note: HVLP guns used in NGR Booths at 65% TE; Other Booths use Airless Spray guns at 40% TE.						

APPENDIX

HAP COMPOSITION

Finishing Material Description	Finishing Material Code (EDS)	Toluene (wt.fr.)	Methanol (wt.fr.)	Xylene (wt.fr.)	2-Butoxyethanol (wt.fr.)	Naphthalene (wt.fr.)	MIBK (wt.fr.)	Formaldehyde (wt.fr.)	Ethyl Benz (wt.fr.)
Acetone	Acetone								
Butyl Oxitol	Butyl Oxitol								
Ester Solvent	EEP								
142 Solvent	142H								
Black Sealer	T65XXB20137								
CLQ Wiping Stain	S64XXR16670								
FLQ Fruitwood	S64XXN15503								
Amaretto NGR	S61XXN19085								
Grand View NGR	S61XXN26024								
Vinyl Sealer	T67FV0006	0.005							
Summer Lacquer	T75FV0037	0.005							
Burnt Umber WS Concentrate	S64N37			0.01					0.002
Mocha NGR	S61XXN19713								
Mocha WS	S64XXN19714								
Legends Brown Cherry NGR	S61XXN22171								
White Primer	P65XXW26234								0.001
Legends Low VOC White	T75XXW26294			0.01					0.001
White	T70XXW26668								
Home Depot Cans	15X016 (Cans)						0.03		0.05

APPENDIX

HAP EMISSIONS

Finishing Material Description	Finishing Material Code (EDS)	Toluene (Lbs)	Meth-anol (Lbs)	Xylene (Lbs)	Glycol Ether (Lbs)	Naphthalene (Lbs)	MIBK (Lbs)	Formaldehyde (Lbs)	Ethyl Benz (Lbs)
Acetone	Acetone	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Butyl Oxitol	Butyl Oxitol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ester Solvent	EEP	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
142 Solvent	142H	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Black Sealer	T65XXB20137	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CLQ Wiping Stain	S64XXR16670	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FLQ Fruitwood	S64XXN15503	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Amaretto NGR	S61XXN19085	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grand View NGR	S61XXN26024	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vinyl Sealer	T67FV0006	807.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Summer Lacquer	T75FV0037	862.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Burnt Umber WS Concentrate	S64N37	0.00	0.00	0.48	0.00	0.00	0.00	0.00	0.10
Mocha NGR	S61XXN19713	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mocha WS	S64XXN19714	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Legends Brown Cherry NGR	S61XXN22171	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
White Primer	P65XXW26234	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.29
Legends Low VOC White	T75XXW26294	0.00	0.00	8.24	0.00	0.00	0.00	0.00	0.82
White	T70XXW26668	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Home Depot Cans	15X016 (Cans)	0.00	0.00	0.00	0.00	0.00	10.16	0.00	14.75
		1,669.47	0.00	8.72	0.00	0.00	10.16	0.00	18.96

NON-TITLE V COMPLETENESS DETERMINATION CHECKLIST

Items 1-15 Front page: Items 1 to 15 (14 for Renewals) must be completed.

Notes to engineer:

- For renewal applications the source must either answer 'No' to questions 2-5 or submit an application for a permit modification.
- Item 8: Many applicants do not know the SIC code or NAICS code for their industry. For a new application the code can be obtained by doing an on-line search. <http://www.osha.gov/pls/imis/sicsearch.html>
- Items 5, 7 and 14: These may be the same for many applicants.

Complete: Incomplete:

Item 16: A simple site diagram has been included, preferably on a standard size paper. Detailed blueprints or construction drawings are not required.

Complete: Incomplete: N/A:

Item 17: A simple process flow diagram on a standard size paper is preferred. A process flow diagram may not be needed for some small businesses.

Complete: Incomplete: N/A:

Item 18: An O&M plan is required only for a control device. An O&M plan is not required for a spray booth. Instead of including the O&M plan with the application, an applicant may submit it after receiving the permit.

Complete: Incomplete: N/A:

Item 19: A dust control plan, if required, must accompany the permit application. The plan will be reviewed and approved by the dust compliance group.

Complete: Incomplete: N/A:

Item 20: The applicant needs to complete only those sections of the permit application that are applicable.

Complete: Incomplete: N/A:

Notes to engineer:

- Concerning Section Z: Many applicants will not be able to perform these engineering calculations. We will accept the permit application with a blank Section Z.

Instructions for completing Sections A, B, C, D, E-1, E-2, F, G, H, I, J, K-1, K-2, K-3, K-4, L, M, X-1, X-2, Y and Z of the permit application are included at the beginning of each section and are self-explanatory.

In general, a material safety data sheet (MSDS) is required for each chemical used, stored or processed at the facility. Exceptions are for very common materials, such as gasoline, diesel, acetone, etc.

Business name: Legends Furniture Inc

Permit number: 040172

Completeness review completed.

Application determined to be: Complete: Incomplete:

Permit Engineer: Robert Tate

Date: 01/27/2016