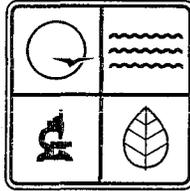


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION

PERMIT BOOK



PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **022007 - 010** Project Number: **2006-09-052**

Owner: **S&W Cabinets, Inc.**

Owner's Address: **490 Cummins Drive, Chaffee, MO 63740**

Installation Name: **S&W Cabinets, Inc.**

Installation Address: **1120 Cummins Drive, Chaffee, MO 63740**

Location Information: **Scott County, S12, T29, R12**

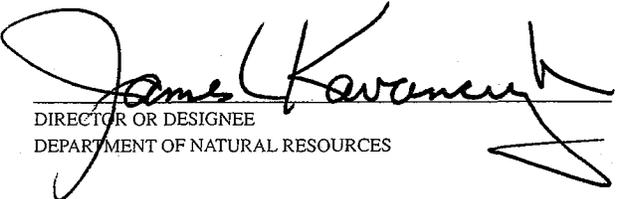
Application for Authority to Construct was made for:

Installation of sawing and sanding operations, a spray booth, and natural gas heaters. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

FEB 15 2007

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

Page No.	2
Permit No.	
Project No.	2006-09-052

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

S&W Cabinets, Inc.
Scott County, S12, T29, R12

1. Emission Limitation
 - A. S&W Cabinets, Inc. shall emit less than 40 tons of Volatile Organic Compounds (VOCs) from the entire installation, as outlined in Table 2 and Attachment D, in any consecutive 12-month period.
 - B. S&W Cabinets, Inc. shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation, as outlined in Table 2 and Attachment D, in any consecutive 12-month period.
 - C. Attachment A, Attachment B and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A) and 1(B). S&W Cabinets, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at this installation.
 - D. S&W Cabinets, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(C) indicate that the source exceeds the limitation of Special Conditions Number 1(A), or 1(B).
2. Control Device

Fabric filters in the woodworking area (EP1 and EP2) and the high efficiency filter in the spray booth (EP3) must be in use at all times when the woodworking equipment and spray guns associated with these emission points are in operation. The filters shall be operated and maintained in accordance with the manufacturer's specifications.

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Permit No.	
Project No.	2006-09-052

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

3. **Housekeeping Requirement**
S&W Cabinets, Inc. shall keep the cleaning solutions in sealed containers whenever the materials are not in use. S&W Cabinets, Inc. shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2006-09-052
Installation ID Number: 201-0115
Permit Number:

S&W Cabinets, Inc.
1120 Cummins Drive
Chaffee, MO 63740

Complete: September 18, 2006
Reviewed: November 9, 2006

Parent Company:
S&W Cabinets, Inc.
490 Cummins Drive
Chaffee, MO 63740

Scott County, S12, T29, R12

REVIEW SUMMARY

- S&W Cabinets, Inc. has applied for authority to install sawing and sanding operations, a spray booth, and natural gas heaters.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are toluene, ethylbenzene, xylene, and methanol.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart JJ, *National Emission Standards for Wood Furniture Manufacturing Operations* will not apply since this facility is limited to below major source levels.
- Fabric filters in the woodworking area (EP1 and EP2) and a high efficiency filter in the spray booth (EP3) are being used to control the particulate matter less than 10 microns in diameter (PM₁₀).
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC and HAPs are conditioned to de minimis levels.
- This installation is located in Scott County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are conditioned to de minimis levels.
- Emissions testing is not required for the equipment.
- No Operating Permit will be required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

S&W Cabinets, Inc. owns and operates two cabinet manufacturing plants located in Chaffee, Missouri: the Highway M Plant (FID #201-0089) and the Cummins Drive Plant (FID# 201-0115). Operations at the Highway M Plant consists of the production of high-end custom cabinets while the Cummins Plant manufacturers commercial cabinets. Although each plant has a separate FID number, both plants meet the definition of one “installation” as defined by 10 CSR 10-6.020 (2)(1)(7) and are considered one installation for permitting purposes. Although S&W Cabinets, Inc. is referenced with two different FID numbers, FID number 201-0115 will be used for the permitting of both plants and should be used to refer to the entire installation as designated in Table 2 . However, for clarity in this permit, original FID numbers may be used to separate emission points or refer to previous projects.

No construction permits have been issued to S&W Cabinets, Inc. from the Air Pollution Control Program. However, the following projects have been reviewed by the Air Pollution Control Program.

Table 1: Reviewed projects

Location	Project Number	Description
201-0089	1999-10-062	Basic Operating Permit issued
	2006-08-090	Basic Operating Permit renewal
201-0115	1999-10-063	No (construction) permit required letter issued
	2006-08-084	Basic Operating Permit issued

PROJECT DESCRIPTION

S&W Cabinets, Inc. is currently proposing to add another building to their existing Cummins Plant to assemble pre-cut and pre-finished cabinets. Proposed operations at the new plant will consist of sanding, cutting, and finishing of the cabinets, which will increase potential emissions of the installation, which is an existing minor source. Since the Highway M Plant and the Cummins Drive Plant are considered one installation, the existing potential emissions of both plants were used for this permit applicability determination. Table 2 lists the emission points and their cumulative maximum hourly design rates (MHDRs) for each location. A more detailed list of the equipment at the installation can be found in Attachment D.

Table 2: List of equipment and emission points

Location	Emission Point	Description	MHDR
201-0115	EP1	Cutting (1-Beam Saw)	0.76 tons
	EP2	Sanding	0.12 1000 cubic feet
	EP3	Gluing Operations (2 spray guns)	0.7 gallons
	EP4	Finish Coating (5 spray guns)	1.14 gallons
	EP5	Natural Gas Space Heaters	0.75 MMBTU
201-0089	EP1	Cutting	0.76 tons
	EP2	Sanding	0.12 1000 cubic feet
	EP3	Finish Coating	1.14 gallons
	EP4	Natural Gas Space Heaters	1.17 MMBTU
New Equipment	EP1	Cutting (1-table saw; 1-chop saw)	0.13 ton
	EP2	Sanding (1-pocket screw machine, 1-downdraft table)	0.12 1000 cubic feet
	EP3	Finish Coating (Spray booth)	1.4 gallons
	EP4	Natural Gas (7-216,000 BTU heaters, 2-160,000 BTU heaters, 2-137,000 BTU heaters, 1-82,000 BTU heater, 4-128,700 BTU heater)	2.7 MMBTU

The maximum hourly design rate (MHDR) for all of the woodworking equipment and the painting operations were based on the historical amount of wood processed and application of the paints. A 2006 Grizzly Model G0508 10 HP dust collector collects dust from the woodworking machines.

There is potential for VOCs emissions in the woodworking area from the application of hot melt glue that is used with the edge banders. However, based on maximum historical usage, VOCs from the glue are estimated to be less than 0.05 tons per year. Therefore, VOC emissions from the woodworking area are viewed as insignificant.

EMISSIONS/CONTROLS EVALUATION

The main air pollutants of concern for the facility are PM₁₀, VOCs, and HAPs. For the equipment in the woodworking area (EP1), PM₁₀ emissions were determined using emission factors from the Environmental Protection Agency document Factor Information Retrieval (FIRE) V6.24, *Source Classification Codes and Emission Factors Listing for Criteria Air Pollutants* (SCC # 3-07-008-02 and # 3-07-016-60). A capture efficiency of 90% and PM₁₀ control efficiency of 90% was used to determine the PM₁₀ emissions from the dust collector.

The emissions determined for the spray booth (EP3) were estimated using information obtained from the Material Safety Data Sheets provided in the application for the stain, sealer, lacquer, and thinner. A mass balance approach was used and 100% of the VOC and HAP content of the coatings and thinner are assumed to be emitted into the atmosphere. Due to the various HAPs contents of the paints, the worst-case scenario was assumed for the individual and combined HAPs. PM₁₀ emissions for the spray booth were evaluated based on the solids content of the coating. If not specifically stated, the solids content of the material was conservatively estimated by taking the density of the paint and subtracting the VOC content and assuming the remainder to be all PM₁₀. PM₁₀ emissions are controlled through the use of a high efficiency filter having a minimum control efficiency of 90%.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing potential emissions were obtained from Project #1999-10-063. Existing actual emissions were obtained from the 2005 Emission Inventory Questionnaires (EIQ) of both the Highway M Plant and the Cummins Drive Plant. The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	**Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	5.83	5.23	2.65	N/A
SO _x	40.0	0.00	N/D	1.48	N/A
NO _x	40.0	0.30	0.06	1.48	N/A
VOC	40.0	38.89	10.47	34.86	<40
CO	100.0	0.13	0.05	0.63	N/A
HAPs	10.0/25.0	7.23	N/D	15.24/21.73	<10/<25

N/A = Not Applicable; N/D = Not Determined

**Combined actual emissions of FID# 201-0089 and 201-0115.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of criteria pollutants and HAPs are conditioned to de minimis levels.

APPLICABLE REQUIREMENTS

S&W Cabinets, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of*

Origin, 10 CSR 10-6.170

- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Emily E. Wilbur
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 14, 2006, received September 18, 2006, designating S&W Cabinets, Inc. as the owner and operator of the installation.
- U.S. EPA document FIRE V6.24.
- Material Safety Data Sheets
- Southeast Regional Office Site Survey, dated September 28, 2006.

total of less than ten (10.0) tons for the installation indicates compliance.

Attachment D: Detailed List of Equipment at the Installation

S&W Cabinets, Inc.
 Scott County, S12, T29, R12
 Project Number: 2006-09-052
 Installation ID Number: 201-0115
 Permit Number:

PLANT 0089

Emission Point ID	BRAND	MACHINE	MODEL #	SERIAL #
EP1	DEWALT	CHOP SAW 12"	DW 705	68839
EP1	DEWALT	CHOP SAW 12"	DW 705	23286
EP1	HOLZ-HER	PANEL SAW	1270 SUPER CUT	114.7013
EP1	HOLZ-HER	PANEL SAW	1203	612731
EP1	DELTA	BAND SAW	52-963	93B03812
EP1	DELTA	TABLE SAW 10"	34-806	91A01628
EP1	GRASS	DOOR HINGE MACHINE	ECO-PRESS-P	97103539
EP1	CASTLE TOOL	BARREL DRILL	TSM21	61877
EP1	POWERMATIC	SHAPER	27	9527541
EP1	JET	DRILL PRESS	JDP-17MF	5073183
EP1	RITTER	LINE BORE MACHINE	R-46	278
EP1	R.L. CARTER	OVERHEAD ROUTER	ORS-5	A1
EP1	HER-SAF	PANEL ROUTER	134	505
EP1	DELTA	SHAPER		133-998
EP1	DELTA	SHAPER		105-5001
EP1	POWERMATIC	SHAPER	26	91267010
EP1	POWERMATIC	SHAPER	26	8526466
EP1	Hitachi	Plunge Routers	TR-12	800069
EP1	Hitachi	Plunge Routers	TR-12	980476
EP1	DEWALT	CHOPSAW 12"	PW705	39310
EP2	GRIZZLY	36" WIDE BELT SANDER	H2934	3111306
EP2	DENRAY	DOWN DRAFT SAND TBL	9600	467318
EP2	RODGERS	EDGE SANDER	800	629113
EP2	ROCKWELL	SANDER / GRINDER	31-352	KM2205
EP2	ACME	STROKE SANDER	6B4051	
EP2	TIMESAVER	WIDEBELT SANDER	137-1HD	12408
EP3		4 Spray Pots		
EP4	Heil	1 HEATER	867766022	
EP4	Luxaire	1 HEATER	UH150LC	
EP4	Heil	4 HEATERS	NUGS100HAO	
EP4	Modine	1 HEATER	PA150AB	
EP4	Amana	1 HEATER	GUCA115BX50	
EP4	Modine	2 HEATERS	DJ225AC	

PLANT 0115

Emission Point ID	Manufacturer	Type	Model	Serial #
EP01	CTD Machines	Chop Saw	M2JR	104
EP01	Dewalt	Compound Mitre Saw	DW708	65965
EP01	Dewalt	Chop Saw	DW705	115502
EP01	Dewalt	Compound Mitre Saw	DW708	27819
EP01	Dewalt	Chop Saw	DW705	112428
EP01	Dewalt	Compound Mitre Saw	DW708	250678
EP01	Holz-Her	Vertical Panel Saw	100-02	IP51
EP01	Homag	Espana Panel Saw	CH12/32/32	0341-07-4870
EP01	Holzma	Optimat Panel Saw	HPP350/31/31	0-240-06-5952
EP01	CTD	Toekick Saw	N80	226
EP01	Delta Unisaw	10" Table Saw	34-806	97F98847
EP01	Delta Unisaw	10" Table Saw	34-806	98B96625
EP01	Delta/Rockwell	10" Table Saw	34-450	GF9823
EP01	Grizzly	10" Table Saw	G1023ZX3	O68914
EP01	HCBbrandt	Edgebander	KD69-Q Type B	950317J
EP01	Holz-Her	Edgebander	1408	1661983
EP01	Grass	Hinge Machine	Eco	95101316
EP01	Grass	Hinge Machine		12489
EP01	HC Weeke	Optimat #1	BP12 WE9773	0-250-04-1513
EP01	HC Weeke	Optimat #2	BP12 WE9773	0-250-05-2046
EP01	Delta	Shaper		154232
EP01	Hoffman	Dovetail Machine	PU2	25780
EP01	Powermatic	Planer	15	100015052
EP01	Powermatic	Shaper	27	9927069
EP01	Blum	Minipress	M501002	CD4445
EP02	Denray	Downdraft Table	7200B	467066
EP02	Rodgers	Belt Sander	800	28552
EP02	Grizzly	Oscillating Edge Sander	G9985	91120FG6
EP02	Fein	Sander	MSI 636-1	6.11366
EP03	ARO	Glue Pump	66605X-X	
EP03	Binks	Glue Pump	135-100	
EP04	Binks Sames	Spray Booth #1		
EP04	Binks Sames	Spray Booth #2		
EP04	Binks	Spray Pot	83-15473	134330
EP04	Binks	Spray Pot	83-5407	2122-388
EP04	Binks	Spray Pot	83-15474	127588
EP04	Devilbis	Spray Pot	1416-497	103923
EP05	Weather Rite	Make Up Air Unit		
EP05	Amana	Furnace #1-6	AirCom90	
EP05	Amana	Furnace #7-8	AirCom90	
EP05	Amana	HVAC	PGB48C1520	9706170220

EP05	Amana	HVAC	PGB48C1520	9706170210
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Ms. Jackie Brown
Office Manager
S&W Cabinets, Inc.
1120 Cummins Drive
Chaffee, MO 63740

RE: New Source Review Permit - Project Number: 2006-09-052

Dear Ms. Brown:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:ewl

Enclosures

c: Southeast Regional Office
PAMS File: 2006-09-052

Permit Number: