

STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF AIR MANAGEMENT

NEW SOURCE REVIEW PERMIT TO CONSTRUCT AND OPERATE A STATIONARY SOURCE

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and \$22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator: Kingswood Kitchens, Inc.

Address: 70 Beaver Street, Danbury, CT 06810

Equipment Location: 70 Beaver Street, Danbury, CT 06810

Equipment Description: Spray Booth No. 4

Town-Permit Numbers: 044-0083

Premises Number: 226

Permit Issue Date: March 15, 1995

Modification Issue Date: June 26, 2009

Expiration Date: None

/s/ Anne Gobin for
Amey Marrella
Acting Commissioner

<u>June 26, 2009</u> Date

STATE OF CONNECTICUT, DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF AIR MANAGEMENT

PART I. PROCESS DESCRIPTION

A. General Process Description

Kingswood Kitchens, Inc. operates a Binks spray booth and spray gun. The spray booth is used to coat wooden parts used in kitchen cabinet manufacturing.

B. Equipment Design Specifications

- 1. Number of Spray Guns per Booth: 1
- 2. Maximum Rated Spray Gun Throughput (gallons per hour): 7.2 gal/hr
- 3. Type of Spray Gun: Binks Model 2001

C. Control Equipment Specifications

- 1. Control Equipment: Dry Filter
- 2. Minimum Transfer Efficiency (%): 60%
- 3. Minimum Particulate Matter Filter Removal Efficiency (%): 97%

D. Stack Parameters

- 1. Maximum Exhaust Temperature (°F): 70° F
- 2. Maximum Exhaust Flow Rate (acfm): 18,000 acfm
- 3. Minimum Distance to Property Line (feet): 70 feet
- 4. Minimum Stack Height (feet): 43 feet

PART II. OPERATING REQUIREMENTS

Notwithstanding the design specifications or description provided in Part I, above, the Permittee of the subject source shall comply with the following operating requirements.

A. Operating Parameter Limitations

- Maximum VOC Content per Gallon of Coating, as Applied (pounds per gallon): 6.044 lb/gal
- 2. Maximum Hourly Coating Usage, as Applied (gallons): 7.2 gal/hr
- Coating/Solvent Restriction: Any organic coating or solvent may be used that is not defined as a highly photo-chemically reactive material pursuant to RCSA \$22a-174-20(i)(1) or -20(i)(2)

The coating usage limit applies to any of the following components or mixtures of the following components: Paint, Enamel, Lacquer, Catalyst, Primer, Reducer, Sealer, Diluent, Additive, Stain, Topcoat, Basecoat, or other Coating Material or Preparation.

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PART II. OPERATING REQUIREMENTS, CONTINUED

B. Operating & Maintenance Requirements

The Permittee shall comply with any stipulation and recommendations set by the manufacturer for maintaining and operating the spray gun, spray booth, and particulate filter in order to achieve their guaranteed transfer and capture efficiencies. The control equipment shall be in place at all times. In addition, methods used to increase transfer efficiency and minimize VOC emissions shall include, but not be limited to, the following:

- 1. Minimize the distance from the spray gun to the object being coated;
- Minimize the air velocity in the spray booth (but not below health-based requirements);
- 3. Keep the atomizing air pressure to a minimum level, as recommended by the spray gun manufacturer;
- 4. The spray booth, spray guns, and filter media shall comply with any supplied warranties, recommendations and stipulations set by the manufacturer of the equipment;
- 5. All control equipment specified in this permit shall be properly installed and in good operating condition before the spray booth is operated;
- 6. Coating and solvent containers shall be kept tightly sealed unless in immediate use; and
- 7. Rags containing solvent shall be kept in closed containers and disposed of or recycled according to applicable state and federal law.

C. VOC RACT - Wood Furniture Manufacturing Control Technique Guideline (WFM CTG)

The following WFM CTG requirements set forth in C.1 through C.4 of this Part, apply to all finishing operations at the premises (Permit Nos.: 044-0078, -0079, -0080, -0083, -0084, -0173, & -0174). Emissions standards apply only to topcoats and sealers. However, when using the averaging approach set forth in Paragraph "iv", C.1 of this Part, other coatings including stains, washcoats, and basecoats may be used to demonstrate compliance with the WFM CTG. For detailed requirements see Appendix A.

- 1. **EMISSION STANDARDS** The Permittee shall limit VOC emissions from finishing operations by one of the following:
 - i. Using topcoats with a VOC content no greater than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied; or
 - ii. Using a finishing system of sealers with a VOC content no greater than 1.9 kg VOC/kg solids (1.9 lb VOC/lb solids), as applied, and topcoats with a VOC content no greater than 1.8 kg VOC/kg solids (1.8 lb VOC/lb solids), as applied; or

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PART II. OPERATING REQUIREMENTS, CONTINUED

- iii. Using acid-cured alkyd amino vinyl sealers or acid-cured alkyd amino conversion varnish topcoats, using sealers and topcoats based on the following criteria:
 - (a) If acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats are used, the sealer shall contain no more than 2.3 kg VOC/kg solids (2.3 lb VOC/lb solids), as applied, and the topcoat shall contain no more than 2.0 kg VOC/kg solids (2.0 lb VOC/lb solids), as applied; or
 - (b) If a sealer other than an acid-cured alkyd amino vinyl sealer and acid-cured alkyd amino conversion varnish topcoats are used, the sealer shall contain no more than 1.9 kg VOC/kg solids (1.9 lb VOC/lb solids), as applied, and the topcoat shall contain no more than 2.0 kg VOC/kg solids (2.0 lb VOC/lb solids), as applied; or
 - (c) If acid-cured alkyd amino vinyl sealer and a topcoat other than an acid-cured alkyd amino conversion varnish topcoat are used, the sealer shall contain no more than 2.3 kg VOC/kg solids (2.3 lb VOC/lb solids), as applied, and the topcoat shall contain no more than 1.8 kg VOC/kg solids (1.8 lb VOC/lb solids), as applied; or
- iv. Meeting the provisions established in the WFM CTG §B.10 (Appendix A) when using an averaging approach and demonstrating that actual emissions from the affected source are less than or equal to the lower of the actual versus allowable emissions using one of the following inequalities:

$$0.9(0.8(TC_1+TC_2+\ldots)) \ge (ER_{TC1})(TC_1) + ER_{TC2}(TC_2) + \ldots)$$
(1)

Inequality 1 applies if the emissions standard set forth in Paragraph "i", C.1 of this Part is selected.

Inequality 2 applies to all other averaging scenarios. The Permittee may use Inequality 2 to average among stains, sealers, topcoats, basecoats, and washcoats or among sealers and topcoats only.

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PART II.OPERATING REQUIREMENTS, CONTINUED

TC_i = kilograms of solids of topcoat "i" used;

Where:

 SE_i = kilograms of solids of sealer "i" used; WC_i = kilograms of solids of washcoat "i" used; BC_i = kilograms of solids of basecoat "i" used; ST_i = liters of stain "i" used; ER_{TCi} = VOC content of topcoat "i" in kg VOC/kg solids, as applied; ER_{SEi} = VOC content of sealer "i" in kg VOC/kg solids, as applied; ER_{WCi} = VOC content of washcoat "i" in kg VOC/kg solids, as applied;

In Inequalities 1 and 2, above, the Permittee shall use the actual VOC content of the finishing materials used before they were subject to RACT if the VOC content is less than the allowed VOC content.

 ER_{BCi} = VOC content of basecoat "i" in kg VOC/kg solids, as applied; and ER_{STi} = VOC content of stain "i" in kg VOC/liter (kg/l), as applied.

- v. Using a control system that will achieve an equivalent reduction in emissions as the requirements of Paragraph "i" or "ii", C.1 of this Part, as calculated using the compliance provisions in WFM CTG §B.6(a)(2) (Appendix A) of this rule, as appropriate; or
- vi. Using a combination of the methods presented in Paragraphs "i", "ii", "iii", "iv", and "v", C.1 of this Part.
- vii. The Permittee shall limit VOC emissions from cleaning operations when using a strippable booth coating. A strippable booth coating shall contain no more than 0.8 kg VOC/kg solids, as applied (0.8 lb VOC/lb solids).

2. WORK PRACTICE STANDARDS

i. Work Practice Implementation Plan - The Permittee shall prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses each of the topics specified in Paragraphs "ii" through "x", C.2 of this Part, below. The plan shall be developed within 60 days of issuance date of this permit. The Permittee shall comply with each provision of the work practice implementation plan. The written work practice implementation plan shall be available for inspection by the Administrator and Commissioner, upon request. If the Administrator and Commissioner determines that the work practice implementation plan does not adequately address each of the topics specified in Paragraphs "i" through "x", C.2 of this Part, the Administrator and Commissioner may require the Permittee to modify the plan.

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PART II. OPERATING REQUIREMENTS, CONTINUED

- ii. Operator Training Course The Permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, cleaning, or wash-off operations or implementation of the requirements of this rule. All new personnel, those hired after the effective date of the rule, shall be trained upon hiring. All existing personnel, those hired before the effective date of the rule, shall be trained within six months of the effective date of the rule. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
 - (a) A list of all current personnel by name and job description that are required to be trained;
 - (b) An outline of the subjects to be covered in the initial and refresher training for each position, or group of personnel;
 - (c) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash-off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes;
 - (d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion and a record of the date each employee is trained.
- iii. <u>Leak Inspection and Maintenance Plan</u> The Permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
 - (a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply finishing materials or organic solvents;
 - (b) An inspection schedule;
 - (c) Methods for documenting the date and results of each inspection and any repairs that were made;
 - (d) The timeframe between identifying a leak and making the repair, which adheres to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than 5 working days after the leak is detected; and

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PART II. OPERATING REQUIREMENTS, CONTINUED

- (ii) Final repairs shall be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- iv. Cleaning and Wash-Off Solvent Accounting System The Permittee shall develop an organic solvent accounting form to record:
 - (a) The quantity and type of organic solvent used each month for wash-off and cleaning;
 - (b) The number of pieces washed off, and the reason for the wash-off; and
 - (c) The net quantity of spent organic solvent generated from each activity. The net quantity of spent solvent is equivalent to the total amount of organic solvent that is generated from the activity minus any organic solvent that is reused onsite for operations other than cleaning or wash-off and any organic solvent that was sent offsite for disposal.
- v. Spray Booth Cleaning The Permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.
- vi. <u>Storage Requirements</u> The Permittee shall use normally closed containers for storing finishing, cleaning, and wash-off materials.
- vii. Application Equipment Requirements The Permittee shall not use conventional air spray guns for applying finishing materials except under any of the following circumstances:
 - (a) To apply finishing materials that have a VOC content no greater than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied;
 - (b) For touch-up and repair under the following circumstances:
 - (i) The finishing materials are applied after completion of the finishing operation; or

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PART II. OPERATING REQUIREMENTS, CONTINUED

- (ii) The finishing materials are applied after the stain and before any other type of finishing material is applied, and the finishing materials are applied from a container that has a volume of no more than 2.0 gallons.
- (c) If spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
- (d) If emissions from the finishing application station are directed to a control device;
- (e) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5% of the total gallons of finishing material used during that semiannual reporting period; or
- (f) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The Permittee shall demonstrate technical or economic infeasibility by submitting to the Administrator and Commissioner a videotape, a technical report, or other documentation that supports the Permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - (i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- viii. Line Cleaning The Permittee shall pump or drain all organic solvent used for line cleaning into a normally closed container.
- ix. <u>Gun Cleaning</u> The Permittee shall collect all organic solvent used to clean spray guns into a normally closed container.
- x. <u>Wash-Off Operations</u> The Permittee shall control emissions from wash-off operations by:
 - (a) Using normally closed tanks for wash-off; and(b) Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

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PART II. OPERATING REQUIREMENTS, CONTINUED

3. COMPLIANCE PROCEDURES AND MONITORING REQUIREMENTS

- i. The Permittee shall maintain records of the following:
 - (a) A certified product data sheet (CPDS) for each finishing material and strippable booth coating subject to the emission limits in C.1 of this Part (WFM CTG §B.4);
 - (b) The VOC content, kg VOC/kg solids (lb VOC lb/solids), as applied, of each finishing material and strippable booth coating subject to the emission limits in C.1 of this Part and WFM CTG §B.4, and copies of data sheets documenting how the as applied values were determined.
- ii. Continuous Compliance Demonstrations The Permittee shall demonstrate continuous compliance by using compliant materials, maintaining records that demonstrate the materials are compliant, and submitting a compliance certification with the semiannual report required by WFM CTG §B.9(c).
 - (a) The compliance certification shall state that compliant sealers and/or topcoats and strippable booth coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The Permittee is in violation of the standard whenever a noncompliant material, as determined by records or by a sample of the finishing material, is used. Use of a noncompliant material is a separate violation for each day the noncompliant material is used.
 - (b) The compliance certification shall be signed by a responsible official of the company.

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PART II. OPERATING REQUIREMENTS, CONTINUED

D. Emission Limits

1. Criteria Pollutants

The Permittee shall not exceed the emission limits stated in Table 1, below, at any time.

Table 1: Allowable Emissions Limits							
Pollutant	lb/hr	lb/day	TPY				
voc	25.0	600.0	8.0				
PM ₁₀ /PM _{2.5}	0.50		2.2				

Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using emission factors from the following sources:

- i. Material Mass Balance; and
- ii. Airless spray gun having an overall transfer efficiency of 60% and filters having a control efficiency of 97%.

The above statement shall not preclude the Commissioner from requiring other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

2. Hazardous Air Pollutants (HAPs)

See Part V of this permit for requirements.

E. Federal Requirements (See Appendix B for Detailed Requirements)
The Permittee shall comply with all applicable sections of the following National Emissions Standards for Hazardous Air Pollutants at all times:

40 CFR Part 63, Subparts A and JJ

PART III. STACK EMISSION TEST REQUIREMENTS

Stack emission/performance testing shall not be required for any pollutant at this time.

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Material Usage Records

- 1. The Permittee shall maintain daily records of each coating and diluent used to determine VOC emissions on an hourly, daily, monthly and cumulative consecutive twelve (12) month basis. Such records shall include:
 - Date each coating is used;
 - ii. Description of each coating, including name and the density (lb/gal) as listed in the Material Safety Data Sheet (MSDS) or Certified Product Data Sheet (CPDS);
 - iii. Volatile organic compound content by weight percentage of the coating as listed in the MSDS or CPDS;
 - iv. Non-volatile content by volume and weight as listed in the MSDS or CPDS;
 - v. Water and exempt VOC content by weight as listed in the MSDS or CPDS;
 - vi. Quantity of each coating used (gallons/hr and gallons/day);

 - viii. Cumulative year to date record of each coating usage (gallons) and VOC emissions (TPY); The consecutive 12 month record of coating usage and VOC emissions shall be determined by adding the current month's record to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month; and
 - ix. Data for determining VOC content and VOC emissions.
- 2. The Permittee shall maintain a daily record of the type and quantity of any solvent that is used to clean the spray guns and booth. In addition, accurate daily records must be kept of the quantity and type of solvents spilled, evaporated, or manifested as waste material.
- 3. Records as required by this permit will be maintained on site for a period of no less than five years and submitted upon request.
- 4. MSDS or CPDS for each coating and solvent used shall be maintained. Such MSDS or CPDS shall include the quantity and type of each hazardous air pollutant contained in the paint or solvent.
- 5. Such daily records shall clearly display, at a minimum, compliance with all materials usage and emissions limitations set forth in this permit.

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, CONT'D

6. The Permittee shall make and keep all required records on the premises to determine compliance with the terms and conditions of this permit in accordance with RCSA §22a-174-4. Such records shall be made available upon request by the Commissioner and kept for the duration of the permit or for the previous five years, whichever is less.

B. Reports of Exceedances

Reports of any exceedances of the material usage or emission limitations, set forth in this permit, shall be submitted to the Department in writing within 30 days of the date of such exceedance. Such report shall at a minimum, include a description of the nature of the exceedance, the duration and magnitude of the exceedance, the steps taken to reestablish compliance and the success of such steps, and the steps taken to assure that compliance is maintained in the future.

C. Continuous Emission Monitoring

Continuous emission monitoring shall not be required at this time.

PART V. HAZARDOUS AIR POLLUTANT (HAPS) MASC COMPLIANCE

Chemical compounds, e.g., coatings, solvents, etc., used by this source now or in the future, either for production or on a trial basis, which contain hazardous air pollutants (HAPs) that are regulated under §22a-174-29 of the Regulations of Connecticut State Agencies (RCSA) are allowed provided that:

A. The Permittee shall demonstrate that actual stack concentrations (ASC) of each HAP does not exceed it's respective maximum allowable stack concentration (MASC) using Equation 3, below,

$$MASC = 16.38 \times HLV \times (@ 18,000 ACFM)$$
 (3)

Where,

MASC = Maximum Allowable Stack Concentration $(\mu g/m^3 \text{ or ppmv})$

HLV = Hazard Limiting Value ($\mu g/m^3$ or ppmv)

The MASC is derived using the corresponding HLV for each HAP as listed in RCSA $\S 22a-174-29$ and is based on the stack parameters given in Part I of this permit.

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PART V. HAZARDOUS AIR POLLUTANT (HAPs) MASC COMPLIANCE, CONTINUED

The ASC shall be derived using the HAP content as applied (lb HAP/gal), the maximum application rate (gal/hr) as a worst case, and any applicable controls. This gives the actual stack emissions in lb/hr, which can be converted to a concentration in $\mu g/m^3$ or ppmv;

- B. The Permittee keeps records of all compounds used, and the respective MSDS or CPDS; and,
- C. The Permittee submits a report of any changes and a demonstration of compliance with permit limits, within thirty (30) days of such changes, to the Department of Environmental Protection, Bureau of Air Management, Engineering & Enforcement Division, 79 Elm Street, Hartford, Connecticut 06106-5127

NOTE: The emissions from any new compounds, for production or trial runs, shall be counted toward any applicable emission limit in this permit.

PART VI. PREMISES REQUIREMENTS

- A. The Permittee shall not cause or permit the emission of any substance or combination of substances, which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA §22a-174-23.
- B. The Permittee shall operate this facility at all times in a manner so as not to violate or contribute significantly to the violation of any applicable state noise control regulations, as set forth in RCSA §\$22a-69-1 through 22a-69-7.4.
- C. The Permittee shall cover all open drums and vessels that contain solvents, cleaners, coatings, or cleaning rags so as to minimize the amount of VOCs emitted to the atmosphere. Empty containers shall be disposed of in a manner consistent with handling techniques for hazardous materials, as applicable.
- D. The Permittee shall operate in compliance with fugitive dust regulations in RCSA §22a-174-18.
- E. Legible signs shall be posted, maintained, and kept clearly visible at all times in both the coating blending and spray booth areas, which clearly specify the allowable gallon per hour application rates.

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PART VII. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B. Any representative of the DEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- C. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- D. This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons of municipalities who are not parties to this permit.
- E. Any document, including any notice, which is required to be submitted to the Commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under \$22a-175 of the Connecticut General Statutes, under \$53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."
- F. Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the Commissioner.
- G. Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the Commissioner.

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PART VII. ADDITIONAL TERMS AND CONDITIONS, CONTINUED

- H. The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.
- I. Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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