

From: [Smith, Clark](#)
To: Gary_Kumpf@storekraft.com
Cc: [Ellis, Melissa](#); [Brown, Dave L](#)
Subject: RE: Permit Question
Date: Thursday, October 14, 2010 8:35:43 AM

Gary,

The 'once-in-always-in' policy is a little confusing for the operating permit program. The policy only applies to the hazardous air pollutant (HAP) program (does not apply to criteria pollutants), and then it only applies if the source is major on the compliance date for the standard. When this happens, the source is always subject to the standard even if they subsequently reduce their HAP emissions to below the major source thresholds. The standards themselves require subject sources to obtain a Class I (major source) permit. To let you know, this is a National policy established by the EPA.

Store Kraft is in this situation. The following is the discussion of this issue in the Fact Sheet for Store Kraft's Class I permit:

SK is considered an affected facility under Title 129, Chapter 28, Section 001.08, which adopts by reference Title 40 CFR Part 63, Subpart JJ, "National Emission Standards for Wood Furniture Manufacturing Operations". The facility is subject to Subpart JJ because it was a major source for HAPs on the initial compliance date and falls under the definition of wood furniture manufacturer. If potential emissions are equal to or greater than 10 tpy of any single HAP or 25 tpy of any combination of HAPs the source is considered major in accordance with 40 CFR 63, Subpart A. SK also had to obtain a Class I operating permit in 2003 because it was a major source of HAPs on the initial compliance date of Subpart JJ.

The NDEQ has been consistent in its application of this policy. In other words, Store Kraft is not the only source that has had to get a Class I permit due to this policy.

Let me know if you have any questions on the above. I have also copied Missy. I'm sure she would also be happy to answer any questions you may have.

Sincerely,

W. Clark Smith, Supervisor
Air Quality Permitting Section
Department of Environmental Quality
Phone: 402.471.4204
Email: clark.smith@nebraska.gov

-----Original Message-----

From: Gary_Kumpf@storekraft.com [mailto:Gary_Kumpf@storekraft.com]
Sent: Wednesday, October 13, 2010 2:46 PM
To: Smith, Clark
Subject: Permit Question

Hi Clark,

I work for Store Kraft in Beatrice and we have a Class 1 air permit. We had an inspection by Dave Brown a month or so ago for our Air Emission Inventory. The last line of his report stated we were correctly classified as a Class 1 source. I asked him if we were classified correctly by a 'once in always in' rule or if we were actually over a threshold.

He told me he was not sure but did not think we would need to be a Class 1 source anymore. He was not aware of a 'once in always in' rule that would require us to stay a Class 1 source. He suggested I contact you. I was told when I took over Environmental duties that there was a 'once in always in' rule and I know Melissa has mentioned it. Maybe that is for a different source like an incinerator?

Can you tell me if there is any way we can stop being a Class 1 source? There are of course a lot of requirements that cost a lot of money so if it is possible we would like to know.

Thank you!

Gary (Ted) Kumpf
Plant Engineer - Environmental / Safety Manager
Store Kraft Manufacturing Company
402-223-1207 402-223-1275 fax
www.storekraft.com

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