

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2008**

Region: Asheville Regional Office
County: Burke
NC Facility ID: 1200074
Inspector's Name: Brendan Davey
Date of Last Inspection: 01/25/2008
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Lexington Furniture Industries - Plant No. 10 Facility Address: Lexington Furniture Industries - Plant No. 10 100 First Street NW Hildebran, NC 28637 SIC: 2511 / Wood Household Furniture NAICS: 337122 / Nonupholstered Wood Household Furniture Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1200074.08A Date Received: 02/11/2008 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04424/T13 Existing Permit Issue Date: 09/13/2004 Existing Permit Expiration Date: 12/31/2008		
Bill McBrayer Human Resource Manager (828) 397-4661 100 First Street, NW Hildebran NC, 28637	Bob Choppa V.P. & General Manager of Upholstery (828) 397-4661 100 First Street, NW Hildebran NC, 28637	Bill McBrayer Human Resource Manager (828) 397-4661 100 First Street, NW Hildebran NC, 28637			
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2008			Comments / Recommendations: Issue 04424/T14 Permit Issue Date: date, 2008 Permit Expiration Date: date, 2013		

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**04424T13**) was issued on **September 13, 2004**, and is currently scheduled to expire on **December 31, 2008**. The renewal application was received on **February 11, 2008**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a manufacturer of upholstered wood furniture consisting mainly of couches and chairs.

III. History/Background/Application Chronology

February 11, 2008 – Permit application **1200074.08A** was received for the renewal of the current Title V permit.

February 28, 2008 – Received verification from the Permittee that there have been no changes to the permitted equipment list which would cause an increase in PM₁₀ emissions above those levels shown in the CAM applicability analysis done in 2004 and that at this time Plant 10 would like to keep all of the same equipment on the permit. This letter is in response to an email that Mark Cuilla sent asking for the specific information provided.

March 6, 2008 – DRAFT permit sent to Permittee, Regional Office, Title V Coordinator for comment prior to public notice and EPA review.

Date, 2008 – DRAFT sent to 30-day public notice and 45-day EPA review prior to issuance.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant activities	-added table of insignificant activities
Cover	-	-amended permit revision numbers and all dates -corrected facility mailing address
All	Header	-amended permit revision number
3	Equipment table	-clarified equipment description where needed
5	2.1 A.2.b 2.1 A.2.d 2.1 A.2.e 2.1 A.2.f 2.1 A.2.g 2.1 A.3	-corrected cross reference -updated shell language -added clarifying language -added “no reporting” language -added clarifying language -reordered Section and corrected rule citation
6	2.1 A.1.e.i.B	-corrected cross reference
7	2.1 B	-clarified equipment description -added testing requirement for boiler (ID No. ES-B3) and renumbered subsequent paragraphs
8-9	2.1 B.3.c	-updated shell language
9	2.1 B.4	-corrected rule citation
10	2.1 C 2.1 C.1.b	-clarified equipment description -updated shell language
11	2.1 C.2.c	-updated shell language
12	2.1 D 2.1 D.1.b 2.1 D.1.c	-clarified equipment description -updated shell language -clarified equipment ID numbers
13	2.1 D.2.c	-updated shell language
14	2.1 E 2.2 A 2.2 A.1	-added table of applicable regulations -clarified equipment ID numbers -corrected rule citation
15	2.2 A.1.c 2.2 C	-updated shell language -clarified equipment ID numbers

Page(s)	Section	Description of Change(s)
25	2.2 D.1	-corrected rule citation
26-35	General Conditions	-updated shell conditions (v2.19)

It should be noted that ESM was compared to the renewed permit for accuracy in equipment descriptions. No significant changes in ESM were required as part of this permit renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0504, Particulates from Wood Burning Indirect Heat Exchangers
15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0524, New Source Performance Standards (Subpart Dc)
15A NCAC 2D .1111, Maximum Achievable Control Technology (Subpart JJ)
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration and 15A NCAC 2D .1111, Maximum Achievable Control Technology)

A regulatory review for the existing sources will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – Both the facility’s natural gas/No. 2 fuel oil/No. 5 fuel oil-fired boiler (**ID No. ES-B2**) and wood fuel-fired boiler (**ID No. ES-B3**) are subject to separate New Source Performance Standards in order to comply with 40 CFR 60, Subpart Dc.

The fuel oil-fired boiler is required to limit the sulfur content of any fuel received to less than 0.5% sulfur by weight, ensure sulfur content through supplier certifications and/or fuel oil sampling. This permit renewal does not affect the status of this regulation.

The wood fuel-fired boiler is required to keep records of the amount of wood fired during each day of operation. Brendan Davey of the ARO, noted in his latest facility inspection that the Permittee has not operated this source since 1998 and has no plans to operate it. This permit renewal does not affect the status of this regulation.

NESHAPS/MACT – The facility is currently subject to the National Emission Standard for Hazardous Air Pollutants (HAPs) for Furniture Facilities (40 CFR 63, Subpart JJ). The permit limits emissions from finishing, cleaning, and contact adhesives. Specific monitoring, recordkeeping, and reporting activities are required for each type of process. This permit renewal does not affect the status of this regulation.

The Permittee is also complying with a facility-wide emissions limit of less than 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs in order to avoid applicability to any additional MACTs that may be applicable to this facility. It should be noted that the only other MACT that may have been applicable is the now vacated combustion MACT. When in the future a decision about this MACT has been made, the avoidance condition will keep it non-applicable to this facility.

PSD – The facility currently operates under a facility-wide emission limit of 242 tons volatile organic compounds per 12-month period for its wood furniture finishing equipment. The Permittee is required to calculate monthly VOC totals using material usage and VOC content calculations. This permit renewal does not affect the status of this regulation.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The significant modification completed in September 2004 removed the requirement that the facility comply with CAM. Previous to that application, CAM had been incorrectly applied to the control devices controlling the woodworking equipment (See Mark Cuilla’s Permit Review for 04424T13 for detailed explanation and history). The Permittee has verified that there have been no changes to the permitted equipment list that would now make CAM applicable to the facility. Therefore, the permit has been renewed without CAM requirements.

VII. Facility Wide Air Toxics

The facility is not currently subject to NC Air Toxics regulations. This permit renewal does not affect this status. It should be noted that the facility will not be pulled into NC Air Toxics as a result of the applicability of any last MACT. The current MACT avoidance has limited applicability of any additional MACTs outside the current exempt furniture MACT (Subpart JJ).

VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)
CO	0.04
NO _x	0.16
PM ₁₀	0.03
SO ₂	0.56
VOC	7.17
Total HAP/TAP	0.29

IX. Stipulation Review

The ARO has not indicated any required permit stipulation modification as part of this permit renewal. In his latest inspection report, Brendan Davey noted the following items:

1. the facility does not appear to be subject to the requirements of the Chemical Accident Release Prevention Program, Section 112(r) of the Clean Air Act;
2. 5 year compliance history – on August 20, 2004, a Notice of Violation was issued for using a noncompliant coating in violation of 15A NCAC 2D .1111, 40 CFR 63.804(a)(2), and Air Quality Permit No. 04424T12;
3. the permit review for permit T13 determined that CAM was not applicable to the facility;
4. the most recent annual compliance certification for CY 2006 per General Permit Condition P was timely received January 29, 2007 and indicated no deviations from the air quality permit; and
5. the facility has a Title III minor permit condition and therefore does not appear to be subject to the Boiler MACT or the Plywood and Wood Composite MACT.

In summary, he indicated that the facility appeared to be in compliance with the applicable air quality regulations.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina is an affected State and the Western NC Regional Air Quality Agency and Mecklenburg County Local Program are affected Local Programs all within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

ARO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance (See History Section of this Document for a listing of dates).

RCO concurs with ARO's recommendation to issue the renewed air permit.