

AIR PERMIT REVIEW

APPLICANT: Century Furniture Plant No. 9		SITE LOCATION: Bethlehem		COUNTY: Alexander	
TECHNICAL CONTACT: John Groves	PHONE: (828) 326-8570	RESPONSIBLE OFFICIAL: Wade Yount		TITLE: Plant Manager	
REVIEW ENGINEER: Wallace Pitts		SIGNATURE:		DATE: March 2, 2004	
REGIONAL CONTACT: Angela Hall		REGIONAL OFFICE: MRO		SIC CODE: 2511	
APPLICATION NUMBER: 0200011.03A		EXISTING PERMIT NUMBER: 02519T11		NEW PERMIT NUMBER: 02519T12	

I Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The initial Title V permit (0251T19) was issued on March 25, 1999, and is currently scheduled to expire on February 28, 2004. The renewal application was received on February 20, 2003, 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

Century Furniture Plant # 9 –The facility manufactures and finishes wooden household furniture. The facility operates approximately eight hours per day, five days per week. A list of the permitted sources is given in the following table.

The following table identifies all emission sources and associated control devices for which the Title V Operating Permit is being issued.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-B1	No. 2 fuel oil-fired boiler (6.3 million Btu per hour heat capacity)	None	None
ES-B2	No. 2 fuel oil-fired boiler (14.6 million Btu per hour heat capacity)	None	None
ES-B3	Woodwaste-fired boiler (15.4 million Btu per hour heat capacity)	C1	One multicyclone (12 nine inch diameter tubes)
ES-WW1	Woodworking operation	BF1 C2A & C2B	One (1) cartridge type baghouse (16,000 square feet of filter area) Two simple transfer cyclones in series
ES-WC1	Woodwaste collection system	BF3	One bagfilter (3825 square feet of cloth area)

Furniture finishing operation (ID No. ES -FS1) consisting of:			
SB-1 (MACT)	11 dry filter-type paint spray booths, and four steam heated drying ovens	None	None
SB-2 (MACT)			
SB-3 (MACT)			
SB-4 (MACT)			
SB-5 (MACT)			
SB-6 (MACT)			
SB-7 (MACT)			
SB-8 (MACT)			
SB-9 (MACT)			

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Furniture finishing operation (ID No. ES -FS1) consisting of: Continued			
SB-10 (MACT)	11dry filter-type paint spray booths, and four steam heated drying ovens (continued)	None	None
SB-11 (MACT)			
ES-G1 (MACT)	Gluing operations	None	None
None (MACT)	Four steam heated drying ovens	None	None
Furniture finishing operation (ID No. ES -PS1) consisting of:			
SB-12 (MACT)	Two dry filter-type polyurethane spray painting operations	None	None
SB-13 (MACT)			

III. History/Background/Application Chronology

March 25, 1999 – Initial title V permit 02519T11 issued.

February 20, 2003 – Permit renewal application received and deemed complete for processing.

March 17, 2003 – Permit application review and inspection report received from Angela Hall of the MRO.

February 11, 2004 – I conducted a CAM analysis for this plant, and CAM does not apply (See Section VI of this document for a discussion).

February 11, 2004 – Sent Draft Permit for internal review.

February 16, 2004 – Sent Draft Permit to MRO (Angela Hall) for review.

February 17, 2004 – MRO comments addressed, draft sent to Century Furniture for review.

February 24, 2004 – Century Furniture – no comments.

March 2, 2004 – To issue Public Notice.

IV. Permit Modification/Changes

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

Old Page	New Page	Part	Section	Change
--	--	--	--	Added insignificant activity CD 3A
Cover	Cover			Updated all dates and permit revision numbers
4	4	I	2.1-A.1.b	Changed General Condition II to General Condition JJ
5	5	I	2.1-A.2.a	Updated visible emission monitoring language
5	5	I	2.1-A.2.b	Updated visible emission monitoring language
5	5	I	2.1-A.2.c	Changed General Condition II to General Condition JJ
5	5	I	2.1-A.3.b	Changed General Condition II to General Condition JJ
6	6	I	2.1-B.1.b	Changed General Condition II to General Condition JJ
6	6	I	2.1-B.1.c	Revised testing requirement
6	6	I	2.1-B.1.d	Updated monitoring language
6	6	I	2.1-B.1.e	Updated and added compliance statement for recordkeeping
6	6	I	2.1-B.1.g	Revised reporting language for postmarked on of before January 30 and August 30
6	6	I	2.1-B.2.b	Changed General Condition II to General Condition JJ
7	7	I	2.1-B.3.a	Updated visible emission monitoring language
7	7	I	2.1-B.3.b	Changed General Condition II to General Condition JJ
7	7	I	2.1-B.3.c	Updated visible emission monitoring language
7	7	I	2.1-B.3.d	Added compliance statement for recordkeeping
8	8	I	2.1-B.3.e	Revised reporting language for postmarked on of before January 30 and August 30
8	8	I	2.1-C.1.b	Updated monitoring language
8	8	I	2.1-C.1.c	Added compliance statement for recordkeeping
8	8	I	2.1-C.1.e	Revised reporting language for postmarked on of before January 30 and August 30
8	8	I	2.1-C.2.a	Updated visible emission monitoring language
		I	2.1-C.2.b	Changed General Condition II to General Condition JJ
8	8	I	2.1-C.2.d	Added compliance statement for recordkeeping
8	8	I	2.1-C.2.c	Updated monitoring language
9	9	I	2.1-C.2.e	Revised reporting language for postmarked on of before January 30 and August 30
9	9	I	2.1-D.1.b	Updated monitoring language
9	9	I	2.1-D.1.c	Added compliance statement for recordkeeping

9	9-10	I	2.1-D.1.e	Revised reporting language for postmarked on of before January 30 and August 30
9	10	I	2.1-D.2.a	Updated visible emission monitoring language
9	10	I	2.1-D.2.b	Changed General Condition II to General Condition JJ
10	10	I	2.1-D.2.c	Updated monitoring language
10	10	I	2.1-D.2.d	Added compliance statement for recordkeeping
10	11	I	2.1-D.2.e	Revised reporting language for postmarked on of before January 30 and August 30
11	11	I	2.1-E.1.c	Added compliance statement for recordkeeping
11	11	I	2.1-E.1.e	Revised reporting language for postmarked on of before January 30 and August 30
11	11	I	2.1-E.2.a	Updated visible emission monitoring language
11	11	I	2.1-E.2.a	Changed General Condition II to General Condition JJ
11	11	I	2.1-E.2.c	Updated visible emission monitoring language
12	13	I	2.1-E.2.e	Revised reporting language for postmarked on of before January 30 and August 30
12	13	I	2.2-A	Referenced 15A NCAC 2Q .0317 Avoidance conditions in table
12	13	I	2.2-A.1.b	Added compliance statement for recordkeeping
12	13	I	2.2-A.1	Referenced 15A NCAC 2Q .0317 Avoidance conditions
12	13	I	2.2-A.1.b	Added compliance statement for recordkeeping
12	13	I	2.2-A.1.c,d	Revised reporting language for postmarked on of before January 30 and August 30 . Also, report contents revised
12	13	I	2.2-B	Referenced 15A NCAC 2Q .0317 Avoidance conditions in table
12	13	I	2.2-B.1	Referenced 15A NCAC 2Q .0317 Avoidance conditions
12	14	I	2.2-B.1.b	Added compliance statement for recordkeeping
13	14	I	2.2-C	Changed source description slightly:
13	14	I	2.2-C.1	Revised language
13	14	I	2.2-C.5.b	Revised language
13-15	13-16	I	2.2.C	Updated Subpart JJ requirements
16-23	17-24	I	3	Updated General Conditions

V. Regulatory Review

The facility is subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 2D .0504, Particulates from Woodburning Indirect Heat Exchangers
- 15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2Q .0317 Avoidance conditions for PSD (15A NCAC 2D .0530)
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (Subpart JJ)

No new or additional requirements have been added to this renewed permit. Therefore, a regulatory review will not be included in this document.

VI. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

The facility is not currently subject to any NSPS requirements. The renewal of this permit does not require NSPS analysis.

NESHAP/MACT

Subpart JJ - The facility is currently required to comply with 40 CFR 63, Subpart JJ “Wood Furniture MACT”. Applicable equipment includes 13 spray booths, one gluing operation, and four steam heated drying ovens. Per MRO review, the facility is in compliance with the MACT and continued compliance is expected.

PSD

The facility is currently operating under a PSD avoidance condition. The renewal of this permit does not require PSD analysis.

112(r)

This 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.

CAM

40 CFR 64 requires that a continuous 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 woodworking operations at the facility are controlled by bagfilters and cyclones. Per DAQ guidance, CAM is required on those control devices that see pre-controlled PM10 emissions of 100 tons per year or more. As stated above, CAM is required on control device that are installed on an emission source in order to meet an applicable standard. The woodworking operations are all subject to 15A NCAC 2D .0512, which requires “adequate ductwork and properly designed collectors.” 2D .0512 is an applicable standard; therefore a CAM analysis is required.

The Permittee has provided a CAM analysis based on DAQ guidance. The following table represents the results.

There are three emission sources to which CAM could be applicable

Control Device Description	Process Description	% PM10	PM10 tpy (uncontrolled emissions)
Multi Cyclone (C1)	Wood waste boiler ES-B3	8.8 lb/ton	37.1
Bagfilter 1 (BF1)	Woodworking operation system (ES-WW1)	30.0 tons per year of waste can be processed. Therefore PM10 emissions will be less than 100 tons per year	30.0
Bagfilter 3 (BF3)	Hogging, (shaving/chipping) (ES-WC1)	0*	0

* Percent PM10 based on NC wood working emissions spreadsheet (planning 0%, shaving/chipping 0%, rough sawing 1.89%, fine sawing 0.37%, milling/molding 0%, sanding 23.8%)

CAM will not apply to any control device because all uncontrolled emissions are less than the major source thresholds in the rule.

VII. Facility Wide Air Toxics

The facility is not subject to the toxics regulations. There is no change required for this renewal.

VIII. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection (July 15, 2003), the facility was in compliance with all applicable requirements

IX. Facility Emissions Review

There is no change in emissions for this renewal.

X. Stipulation Review

MRO requested the following permit condition changes/corrections:

- Under condition 2.1.B.1.c add specific date for testing the boiler.
- Change reporting requirements to the 30th of the month required.

XI. Public Notice / EPA and Affected State Review

Pursuant to 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 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant 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. There are no affected States for this facility.

XII. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

MRO recommends issuance of the permit and **does** request a DRAFT permit prior to issuance.