

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2006**

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100570
Inspector's Name: Eric Hudson
Date of Last Inspection: 04/05/2006
Compliance Code: W/In Violation W/regard To Proc Compliance

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Custom Finishers Inc Facility Address: Custom Finishers Inc 2213 Shore Drive High Point, NC 27264 SIC: 2499 / Wood Products, Nec NAICS: 321999 / All Other Miscellaneous Wood Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NA NSPS: NA NESHAP: NA PSD: NA PSD Avoidance: NA NC Toxics: NA 112(r): NA Other:		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100570.06A Date Received: 03/29/2006 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05318/T06 Existing Permit Issue Date: 12/19/2001 Existing Permit Expiration Date: 11/30/2006		
Tom Crane Plant Manager (336) 431-7141 P O Box 7008 High Point NC, 27264	Tom Crane Plant Manager (336) 431-7141 P O Box 7008 High Point NC, 27264	Tom Crane Plant Manager (336) 431-7141 P O Box 7008 High Point NC, 27264			
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2006			Comments / Recommendations: Issue 05318/T07 Permit Issue Date: date, 2006 Permit Expiration Date: date, 2011		

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 (**05318T06**) was issued on December 19, 2001, and is currently scheduled to expire on November 30, 2006. The renewal application was received on March 29, 2006, 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.

It should be noted that there have been no modifications at the facility since the initial Title V permit was issued.

II. Facility Description

The Permittee does custom jobs such as coating display boards for retail products and also coats hardboard backing for furniture and entertainment centers for the furniture industry. Current permitted equipment includes two roller-type flat line painting processes (with associated bake ovens, roll coaters, and print stations), two spray booths, and miscellaneous insignificant activities.

III. History/Background/Application Chronology

March 29, 2006 – Permit application **4100570.06A** received and deemed complete for processing.

April 27, 2006 – I received the Regional Office review of the renewal application. No permit corrections were requested. Eric Hudson did comment that with furniture plants closings, related emissions have decreased from the facility. The Permittee has indicated they will request to change classification to prohibitory small status. DAQ should expect this request in the near future.

April 28, 2006 – DRAFT permit sent to Permittee, Regional Office, and Title V Coordinator for comment prior to public notice and EPA review.

Date, 2006 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

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	-placed in tabular form
Cover	-	-amended permit revision numbers and all dates
All	Header	-amended permit revision number
3	Equipment table	-added MACT subpart references -added equipment ID Nos.
4	2.1 A	-corrected equipment ID Nos.
5	2.1 A.1.c 2.1 A.2.a 2.1 A.2.c 2.1 A.3.a 2.1 A.3.c	-added equipment ID Nos. -added equipment ID Nos. -added equipment ID Nos. -added equipment ID Nos. -added equipment ID Nos. and update shell language
6	2.2 A	-corrected equipment ID Nos.
9	2.2 A.7.b	-corrected cross reference
10	2.2 A.7.e.iii	-corrected cross reference
13	2.2 B.1.c 2.2 B.2	-corrected cross reference -corrected rule citation
14-22	General Conditions	-updated shell language

The following table indicates the modifications to ESM as a result of this permit renewal:

Current Description	Change resulting from permit renewal
Two vent hoods installed on four laser cutting machines (ID No. IA-1)	Added to ESM (already on permit)
One natural gas-fired boiler (2.3 million Btu per hour maximum heat input capacity; ID No. IA-2)	Added to ESM (already on permit)
Two roller-type flat line painting processes (ID No. ES-1) consisting of: Eight natural gas-fired bake ovens Twelve roller coaters Eleven print stations	Two roller-type flat line painting processes (ID No. ES-1) consisting of: -8 natural gas-fired bake ovens (ID Nos. ES1.BO1 through ES1.BO8) -12 roller coaters (ID Nos. ES1.RC1 through ES1.RC12) -11 print stations (ID Nos. ES1.PS1 through ES1.PS11)

V. Regulatory Review

The facility is currently subject to the following regulations:

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 .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1111, Maximum Achievable Control Technology
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document. No new requirements are being added as part of this permit renewal.

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

NSPS – The facility is not subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is not subject to any National Emission Standards for Hazardous Air Pollutants. This permit renewal does not affect this status.

PSD – The facility is not subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

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 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 facility does not employ control devices for the control of any criteria pollutant, therefore; CAM is not applicable.

VII. Facility Wide Air Toxics

The facility is currently operating under 15A NCAC 2Q .0711, Emission Rates Requiring a Permit, for each of the below listed toxic pollutants. The Permittee, in each case, has made a demonstration that facility-wide actual emissions do not exceed the TPERs. The Permittee is required to operate the facility in such a manner that emissions of any listed toxic will not exceed the TPER. A permit modification is required if actual emissions facility-wide will become greater than the corresponding TPER.

Ammonia	0.68 pounds per hour
Ethyl acetate	36 pounds per hour
Formaldehyde	0.04 pounds per hour
Methyl ethyl ketone	78 pounds per day AND 22.4 pounds per hour
Methyl isobutyl ketone	52 pounds per day AND 7.6 pounds per hour
Toluene	98 pounds per day AND 14.4 pounds per hour
Xylene	57 pounds per day AND 16.4 pounds per hour

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

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

Pollutant(s)	2004 Actual Emissions (tpy)
CO	0.13
NO _x	0.16
PM ₁₀	-
SO ₂	-
VOC	31.33
Total HAP/TAP	1.75

IX. Stipulation Review

No permit stipulation modifications were needed for this permit renewal outside those mentioned above.

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 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. The State of Virginia and the Forsyth County Local Programs are states/programs within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for his renewal.

WSRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

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