

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date: XX**

**Region:** Raleigh Regional Office  
**County:** Franklin  
**NC Facility ID:** 3500019  
**Inspector's Name:** Steve Hall  
**Date of Last Inspection:** 08/19/2004  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> The HON Company - Heibert East  <b>Facility Address:</b> The HON Company - Heibert East 7966 NC 56 Highway Louisburg, NC 27549  <b>SIC:</b> 2521 / Wood Office Furniture <b>NAICS:</b> 337211 / Wood Office Furniture Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 3500019.04A <b>Date Received:</b> 01/30/2004 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 02483/T13 <b>Existing Permit Issue Date:</b> 12/15/1999 <b>Existing Permit Expiration Date:</b> 11/30/2004
Mike Johnson Factory/Environmental Manager (919) 497-3614 7966 NC 56 Highway Louisburg NC, 27549+9703	Chris Payne Vice President, Wood Case Goods Group (919) 497-3605 7966 NC 56 Highway Louisburg NC, 27549+9703	Mike Johnson Factory/Environmental Manager (919) 497-3614 7966 NC 56 Highway Louisburg NC, 27549+9703	
<b>Review Engineer:</b> Kevin Godwin  <b>Review Engineer's Signature:</b> _____ <b>Date: XX</b>		<b>Comments / Recommendations:</b> Issue 02483/T14 <b>Permit Issue Date:</b> <b>Permit Expiration Date:</b>	

**1. Purpose of Application**

This revision is a renewal of existing Title V permit 02483T13 pursuant to 15A NCAC 2Q .0513. The initial Title V permit was issued on December 15, 1999 and is set to expire on May 31, 2005. The renewal application was received on February 13, 2004 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewed permit has been either issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewed permit has been issued or denied.

**2. Facility Description**

Heibert East, Incorporated dba The HON Company manufactures finished veneer office furniture at this Louisburg plant. The facility receives hardwood veneer panels, particleboard, and other raw materials from an outside supplier. The veneer panels are glued to the particleboard base, pressed, and cut to the desired shapes and sizes. The furniture is then assembled and routed to the finishing room where it is sent through a series of paint booths and drying ovens.

### 3. Permit Modification/Changes

The initial Title V permit was issued on December 15, 1999. No changes to the permit have taken place since the initial Title V.

### 4. Application Chronology

February 13, 2004           Renewal application from Heibert East, Inc. dba The HON Company deemed complete.

August 6, 2004            Mailed letter requesting compliance assurance monitoring (CAM) applicability.

June 21, 2005            Received response from applicant regarding CAM exemption for woodworking equipment

, 2005                      Draft noticed to public and EPA

### 5. Regulatory Review

The HON Company is subject to the following regulations:

- 15A NCAC 2D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”
- 15ANCAC 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 .0535 “Excess Emissions Reporting and Malfunctions”
- 15A NCAC 2D .1111 “Maximum Achievable Control Technology – Subpart JJ”
- 15A NCAC 2D .1806 “Control and Prohibition of Odorous Emissions”
- 15A NCAC 2Q .0711 “Emission Rates Requiring a Permit”

Below is a summary of potential facility-wide criteria pollutant emissions based on 2003 emissions inventory information.

Pollutant	Emission Rate (tpy)
Carbon monoxide	0.13
Nitrogen oxides	0.97
Particulate matter less than 10 microns	4215
Sulfur dioxide	0
Volatile organic compounds	103.1

The following table summarizes the changes to the existing permit:

Pages	Section	Description of Change
Entire permit	Entire Permit, where applicable	Changed reference from “Air Quality Title V Operation Permit” to “Air Quality Federal Title V and State Operation Permit” and “Air Quality Construction and Operation Permit” to “Air Quality State Operation Permit”
Cover letter	Cover letter	Modified to reflect current permit number, issue and effective date, and associated application information.
N/A	Attachment	Added table with changes to Title V as

		Attachment
4	Section 1 Table of Emission Sources	Changed description of wood dust collection system to read “Wood dust collection system consisting of separate group processes as per CAM determination”
14	Section 3	Updated with most recent General Conditions and List of Acronyms

## 6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), and CAM

### NSPS

New Source Performance Standards do not apply to this facility.

### NESHAPS

The HON Company is subject to 40 CFR Part 63, Subpart JJ “National Emissions Standard for Wood Furniture Manufacturing Operations.” The wood furniture finishing operations must comply with all the requirements of Subpart JJ and 15A NCAC 2D .1111 “Maximum Achievable Control Technology.” The existing permit contains the standard Subpart JJ condition. The facility uses the compliant coating option.

### PSD

Based on potential VOC emissions this facility is classified as PSD major.

### Attainment Status

Franklin County is in attainment for all pollutants.

### 112(r)

Based on the most recent inspection report, The HON Company does not have any sources that are subject to Section 112(r) of the 1990 CAAA.

### CAM

A compliance assurance monitoring (CAM) applicability determination is required for this renewal because: (1) the facility is a Title V source with potential emissions that exceed the Title V major source thresholds without considering controls; and (2) there are sources subject to an emission standard that require controls in order to comply with that standard. The applicant provided a CAM applicability determination in the cover letter to the renewal application. According to the applicant, the emission sources that are potentially subject to CAM are: wood products finishing operations (ID No. ES8), wood fuel/natural gas-fired boiler (21.0 million Btu per hour heat input, ID No. ES805), woodworking operations (ID Nos. ES807, ES808, and ES809), and the wood waste storage silo (ID No. ES804). The following exemptions apply:

Wood products finishing operations (ID No. ES8) are exempt because they are subject to 40 CFR Part 63, Subpart JJ, which is a Section 112 standard promulgated after 11/15/90.

One wood fuel/natural gas-fired boiler (ID Nos. ES805) is exempt since potential uncontrolled PM<sub>10</sub> emissions are less than 100 tons per year. Emissions calculations are based on DAQ accepted Wood Waste Combustion Calculator Spreadsheet for a stoker boiler firing dry wood (< 19% m.c.). PM<sub>10</sub> emissions from the 21.0 million Btu per hour boiler are 38 tons per year.

Woodworking operations (ID Nos. ES807, ES808, and ES809) are controlled by three bagfilters (7,163 square feet of filter area each) and are exempt since PM<sub>10</sub> emissions are less than 100 tons per year. Potential uncontrolled

PM<sub>10</sub> emissions are calculated to be 64.27 tons per year. Potential emissions are calculated based on DAQ accepted Woodworking Emissions Calculator Spreadsheet assuming 1,230 board feet processed per hour at 4.4 pounds per board foot. Woodworking operations are broken down as follows: 20% rough sawing, 20% fine sawing, 40% milling, and 20% sanding.

Wood waste storage silo (ID No. ES804) is exempt since potential uncontrolled PM<sub>10</sub> emissions are less than 100 tons per year.

Therefore, the facility is exempt from the requirements of CAM.

## **7. Facility-wide Air Toxics**

An increase in facility-wide TAP emissions is not expected. The existing permit does contain the standard TAP condition listing the TPER pursuant to 2Q .0711.

## **8. Facility Compliance Status**

The DAQ has reviewed the compliance status of this facility. The HON Company was last inspected on August 19, 2004 by Mr. Steve Hall (RRO). At the time of inspection, The HON Company was found to be in compliance with the requirements of the permit. A Notice of Violation was issued on May 26, 2004 for incomplete reporting in their 2003 annual compliance certification.

The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

## **9. Stipulation Review**

No changes are made to existing stipulations. All stipulations are standard for this type of facility.

## **10. Public Notice/EPA and Affected States 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 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. Virginia is an affected state for this facility.

Public notice of the DRAFT Title V permit was published in the XX on XX and the public comment period ran from XX through XX.

## **11. Conclusions, Recommendations, and Comments**

The renewal Title V application for Heibert East, Incorporated dba The HON Company has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. Upon completion of public notice and EPA review periods, the DAQ proposes to issue the Title V permit renewal.

## **12. Miscellaneous Requirements**

PE Seal

Pursuant to 2Q .0112, no PE Seal was required because the permit renewal does not involve the determination of applicability and appropriateness or performance of air pollution capture and control systems [15A NCAC 2Q .0112(b)(2) and (3)].

#### Zoning

A request for zoning consistency determination is not required for this permit renewal.

#### Fee Classification

Based on potential to emit, this facility has been classified as **Title V Major**. The facility's current IBEAM status is **Title V Major**. This renewal **will not** change the fee classification.