

AIR PERMIT REVIEW

APPLICANT	SITE LOCATION	COUNTY
Hooker Furniture Co.	Pleasant Garden	Guilford
CONTACT	TELEPHONE	Existing P/N
Scott Prillaman	(276) 656-1763 ext 3487	05616T14
APPLICATION NUMBER	REVIEWER	SIGNATURE
4100910.03A renewal	Michael Brandon	
RECOMMENDATION and COMMENT	FEE CLASS	DATE
Issue Permit 05616T15	Title V	February 3, 2004

1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (05616T14) was issued on June 7, 1999 and is currently scheduled to expire on May 31, 2004. The renewal application was due prior to August 31, 2003 and was received on August 25, 2003. 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 has been issued or denied.

2. Facility Description

This facility manufactures entertainment centers and computer cabinets. Processes include woodworking, finishing, and gluing.

3. Application Chronology

The application chronology is reported on the attached IMPAQ sheet.

4. Permit Modification/Changes

- a. The facility was notified on October 27, 2003 that CAM applicability needed to be addressed for the wood waste collection system ESWD1. The applicant initially responded on November 19, 2003 that they were waiting to hear from the AFMA and DAQ Compliance regarding the methodology for addressing the issues of emission estimation and source/control designation. On February 2, 2004 the applicant was request to submit a more refined estimate of wood waste that is actually collected by the system(s) rather than the emissions inventory, which included wood pieces not collected by the system. In addition, the applicant was requested to submit a process flow diagram for the wood waste collection system(s).

Revised estimates show that only about a third of the reported 2.8 million pounds of wood waste was actually small enough to be vacuumed by the system. This resulted in a calculation of potential emission to the control devices (pre-control) of about 57 tons of PM-10. Furthermore, the process flow diagram shows that instead of one collection system there are actually eight wood waste collection systems operating independent from each other. They are connected only in that there is a closed loop pneumatic transfer system (System No. 5) to transport all the wood waste collected in the hoppers to the boiler fuel bin. Three of these systems collect the bulk of the estimated potential wood waste and the 57 tons prorated, based on collection system flow rates, conservatively yields uncontrolled PM-10 emissions of 14, 14, and 29 tons to each of the three independent system control devices. CAM is not applicable.

As a result of the additional analysis, the permit equipment list was revised to correct the presumption that there was only one wood waste system by adding seven additional systems and appropriately parsing the control devices.

- b. Pursuant to 2Q .0523, a glaze spray dry baffle-type spray booth was added to the wood furniture finishing operation (ID No. ES1A) as a Section 502(b)(10) change by utilizing the PART II Construction Section of the Air Quality Permit (permit revision T12).
- c. The seven storage tanks (ID No. ESST1) were removed from the permit equipment list and placed on a new insignificant activities list.

The following table represents the changes in the renewed Title V permit.

Page No.	Condition No.	Change
na	na	An insignificant activities list was added and the seven storage tanks ESST1 were renamed IST1
3	equipment list	The wood waste collection system ESWD1 was split out into eight independent wood waste collection systems
4	equipment list.	The asterisk for the glaze booth addition as a 502(b)(10) change was removed. Notation was added that there is a non source closed loop pneumatic wood waste collection system No. 5.
15	General Conditions	updated
na	PART II	The Part II construction permit for the added glaze booth was removed.

5. Regulatory Review

The facility is subject to the following regulations;

2D .0503 – Particulate from Fuel Burning Indirect Heat Exchangers

2D .0504 – Particulate from Wood Burning Indirect Heat Exchangers

2D .0512 – Particulate from Wood Products Finishing Plants

2D .0516 – Sulfur Dioxide Emissions from Combustion Sources

2D .0521 – Control of Visible Emissions

2D .1111 – MACT Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations

There are no new Regulatory requirements at this time.

6. Facility Compliance Status

The facility is presently in compliance with all regulations and permit requirements. There was one NOV issued for a record keeping violation in 2001.

7. Statement of Compliance

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 has 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 in a timely basis.

8. Facility Emissions Review

There is no change in emissions for this renewal.

9. Stipulation Review

All stipulations are standard for this type of facility.

10. Public Notice/EPA and Affected State Review

Pursuant to 2Q .0521, a notice of the title V permit shall be placed in a Newspaper of general circulation in the area where the facility is located. The notice will provide 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 Region IV. The State of Virginia is located within 50 miles of this facility. Pursuant to 2Q .0522, a notice of the proposed issuance of the renewed Title V permit will be given to Virginia as it qualifies as an affected state.

11. Conclusions, Comments, and Recommendations

The RCO and the WSRO recommend renewal of the Title V permit 05616T15 for this facility.