

Air Permit Review

Permit Issue Date:
CDS No. 372700054

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400054
Inspector's Name: Mike Parkin
Date of Last Inspection: 03/16/2005
Compliance Code: 4/In Compliance - Certification

| | | | | | |
|---|---|--|---|--|--|
| Facility Data | | | Permit Applicability (this application only) | | |
| Applicant (Facility's Name): Kincaid Furn Plt 1 Facility Address: Kincaid Furn Plt 1 168 Main Street Hudson, NC 28638 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: DDDD, DDDDD PSD: PSD Avoidance: NC Toxics: 112(r): Other: Renewal | | |
| Contact Data | | | Application Data | | |
| Facility Contact | Authorized Contact | Technical Contact | Application Number: 1400054.05A Date Received: 07/29/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 01894/T14 Existing Permit Issue Date: 05/23/2001 Existing Permit Expiration Date: 04/30/2006 | | |
| Lewis Herman Jr Environmental Engineer (828) 726-5209 P O Box 605 Hudson NC, 28638 | Reggie Propst Vice President of Operations (828) 726-2834 P O Box 605 Hudson NC, 28638 | Lewis Herman Jr Environmental Engineer (828) 726-5209 P O Box 605 Hudson NC, 28638 | | | |
| Review Engineer: Michael Brandon, P.E. Review Engineer's Signature: _____ Date: _____ | | Comments / Recommendations: Issue 01894/T15 Permit Issue Date: Permit Expiration Date: | | | |

- 1. Purpose of Application**
The Permittee is requesting renewal of the Title V permit.
- 2. Facility Description**
This facility manufactures household wood furniture from its own kiln dried lumber.
- 3. Application Chronology**
The application chronology is detailed on the attached IBEAM Report.
- 4. Permit Modification/Changes**
There have been no changes at the facility and the wood dust/natural gas/No. 2 fuel oil-fired boiler has not been installed to date. Changes to the permit are as follows:

| PAGE | SECTION | CHANGE |
|------|----------------------------|---|
| na | insignificant activities | Insignificant activities were provided identification numbers as listed in IBEAM. |
| 3-4 | 1 Emission Source Table | Emissions source identification numbers were changed to IBEAM designations. |

| PAGE | SECTION | CHANGE |
|------|------------|--|
| | | <p>Group Emission Source ID No. ES-11 was added for non-contact adhesive operations for new MACT DDDD.</p> <p>Description for wood dust collection and transfer systems were rewritten to reflect actual configurations.</p> |
| 5 | 2.1 A. | Added Boiler MACT DDDDD applicability. |
| 5 | 2.1 A.1.c. | Boiler testing requirement revised to include specific date for another boiler test. (Compliance test February 2002 failed 80% of allowable criteria for removal of condition.) |
| 6 | 2.1 A.3.c. | A provision was added to allow three missing days of visible emissions readings per reporting period for the boilers. |
| 7 | 2.1. B. | Added Boiler MACT DDDDD applicability. |
| 5 | 2.1 B.1.b. | Boiler testing requirement removed. (Compliance test February 2002 passed 80% of allowable criteria for removal of condition.) |
| 8 | 2.1 B.3.c. | A provision was added to allow three missing days of visible emissions readings per reporting period for the boilers. |
| 9 | 2.1 C. | Added Boiler MACT DDDDD applicability. |
| 10 | 2.1. D. | Added Boiler MACT DDDDD applicability. |
| 10 | 2.1 D.1.c. | Revised additional boiler testing requirement to coincide with MACT requirements for testing completion 180 days after start up. |
| 12 | 2.1D.5.c | <p>A provision was added to allow three missing days of visible emissions readings per reporting period for the boilers.</p> <p>MRR exclusion was added for firing of natural gas and/or No. 2 fuel oil.</p> |
| 12 | 2.1 D.6 | The sulfur dioxide PSD avoidance condition was revised for semi-annual reporting and correct regulatory citation. |
| 13 | 2.1 E. | Emissions source identification numbers were changed to IBEAM designations. |
| 14 | 2.1 E.2. | Visible emissions monitoring was removed from spray booth and ovens because there are no visible emissions from these sources. |
| 14 | 2.1 E.3 | All of MACT JJ was included in this new section, |
| 20 | 2.1 F. | Conditions modified to include only emission sources and their associated control devices. |
| 21 | 2.1 G. | Section added for Kilns and non-contact gluing operations |
| 21 | 2.1 G.1 | Section added for MACT DDDD applicability. |
| 22 | 2.1 G.2 | Section added for last MACT TAP assessment for sources not subject to MACT JJ or virgin fuel combustion. |
| 22 | 2.1 G.3. | Section added for VOC work practice standards for sources not subject to MACT JJ. |
| 23 | 2.2 A.1. | Facility wide odor requirements moved here from old 2.1 H.1 |
| 23 | 2.2 A.2. | Section added for boiler MACT DDDDD. |
| 24 | 3 | Updated General Conditions added. |

5. Regulatory Review

There are no new NSPS, PSD, or 112(r) regulations that apply.

New NESHAPs include:

- a. the boiler MACT (Subpart DDDDD) with the future compliance date of September 13, 2007 for two wood dust-fired boilers (ID Nos. ES-1 and ES-2) and at start up for the combination fuel-fired boiler (ID No. ES-12); and
- b. the Plywood and Composite Wood Products MACT (Subpart DDDD) for non contact adhesives application operations and wood kilns with a compliance date of October 1, 2007.

The gas-fired boiler (ID No. ES-3) is subject to the boiler MACT notification requirements only. Although the non-contact gluing operations and the wood kilns may also only be subject to the notification requirements of DDDDD, this last applicable MACT requires these operations to perform a facility wide TAP analysis (2D .0705) for sources not subject to MACT JJ or combustion of virgin fuels.

Compliance Assurance Monitoring (CAM)

Two sources were determined to have uncontrolled emissions of PM-10 greater than 100 tons per year. These are one of the wood dust collection systems with fabric filter CD-9, and the wood dust transfer system (ID No. ES-8) with the fabric filter CD-11. These emission sources are subject to regulations that require the installation of proper controls with no emission limits and opacity standards. There are inspection and maintenance requirements in place for the collection systems and control devices and monitoring recordkeeping and reporting requirements in place for visible emissions. These requirements have been determined to be sufficient to assure continuous compliance and are exempt from CAM pursuant to 15A NAC 2D.0614(b)(1)(F).

6. Facility Compliance Status

The last inspection report on March 16, 2005 stated that the facility was in compliance with all applicable regulations and permit requirements.

7. Public Notice/EPA Review

This proposed permit renewal is subject to a 30-day public comment period and a concurrent 45-day EPA review.

8. Conclusions, Comments, and Recommendations

The RCO/ARO recommend renewal of the permit for another five years.