

## AIR PERMIT REVIEW

<b>APPLICANT:</b> Lexington Furniture Industries Plant 10	<b>SITE LOCATION:</b> Hildebran	<b>COUNTY:</b> Burke	
<b>TECHNICAL CONTACT:</b> Stuart Stapleton	<b>PHONE:</b> (336) 236-5316	<b>RESPONSIBLE OFFICIAL:</b> Bill Mitchell	<b>TITLE:</b> Vice President – Manufacturing
<b>REVIEW ENGINEER:</b> Mark Cuilla	<b>SIGNATURE:</b>	<b>DATE:</b> date, 2004	
<b>REGIONAL CONTACT:</b> Brendan Davey	<b>REGIONAL OFFICE:</b> ARO	<b>SIC CODE:</b> 2511	
<b>APPLICATION NUMBER:</b> 1200074.04A	<b>EXISTING PERMIT NUMBER:</b> 04424T12	<b>NEW PERMIT NUMBER:</b> 04424T13	

### I. Purpose of Application

Lexington Furniture has requested the following modifications to their permit:

1. remove all CAM requirements based on supplied particulate matter emission worksheet that demonstrates CAM is not applicable to the wood processing operations at the plant, and
2. change all quarterly reporting requirements to semi-annual reporting.

The modifications suggested here, constitute a significant modification to the permit due to the fact that the monitoring/recordkeeping/reporting requirements are being modified to remove current requirements.

### II. Facility Description

Lexington Furniture Plant No. 10 is a furniture manufacturer located in Hildebran, Burke County, North Carolina. This title V facility has currently permitted sources consisting of two boilers, woodworking operations, and MACT applicable painting and gluing operations. The facility manufactures upholstered wood furniture consisting mainly of couches and chairs. The facility operates eight hours per day, four and half days per week.

### III. History/Background/Application Chronology

**January 20, 2004** – Permit 04424T12 was issued as a renewed permit for a period of five years containing CAM requirements on the facility's wood processing operations.

**April 30, 2004** – Permit application received requesting removal of CAM requirements. Application deemed complete for processing.

**May 24, 2004** – DRAFT permit sent to title V coordinator for comment. Note, per May 24, 2004 email from Brendan Davey, ARO does not request a DRAFT permit prior to issuance.

#### IV. Permit Modification/Changes

The following table describes the modifications to the current permit.

Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision numbers
9	2.1 C.3.a-d	-removed CAM permit condition per request and demonstration by Permittee
13	2.2 A.1.d	-amended quarterly reporting period to semi-annual per EPA guidance and Permittee request
22	2.2 D.1.c	-amended quarterly reporting period to semi-annual per EPA guidance and Permittee request
24	General Condition H	-amended to add definition of "Section 502(b)(10) changes" per EPA guidance
25	General Condition I.A	-amended clarification to "Permit Deviations" per EPA guidance

#### 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 2D .0524, NSPS 40 CFR Part 60 Subpart Dc  
15A NCAC 2D .1111, Maximum Achievable Control Technology (Subpart JJ)  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2Q .0317, Avoidance Conditions (PSD Avoidance)

No new or additional requirements have been added to this permit as a result of this request for significant modification. Therefore, a regulatory review will not be included in this document.

#### VI. NSPS, NESHAPS, PSD, 112(r), CAM

##### NSPS

The facility's two boilers are subject to 40 CFR 60, Subpart Dc (when operating at full capacity). This application does not add any new requirements. Continued compliance is expected.

##### NESHAP/MACT

The facility is currently required to comply with 40 CFR 63, Subpart JJ "Wood Furniture MACT". This application does not add any new requirements.

##### PSD

This facility is currently a PSD minor facility operating under a PSD avoidance condition for facility-wide VOC emissions. This application does not add any new requirements.

##### 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**

For the purpose of CAM applicability, the facility is required to demonstrate compliance with the particulate standard of 15A NCAC 2D .0512, which requires adequate ductwork and properly designed collectors. A CAM demonstration would be required if the pre-controlled emissions of PM10 from the wood working operations were greater than 100 tons per year. For the purposes of CAM the “operation” consists of each individual control device and its associated emissions units. The woodworking operations (ES-WD) are controlled by thirteen bagfilters. The facility writes that the actual emissions of wood waste generated at the facility was calculated. This total amount was divided equally by the number of control devices. The facility explains that it finds that each bagfilter has roughly an equal mix of operations going into them.

The following table represents the process information as provided by the Permittee in defense that CAM does not apply to the control devices associated with the wood working operations at the facility.

<b>Control Device ID</b>	<b>Process Description</b>	<b>Particulate (tpy)</b>	<b>% PM10*</b>	<b>PM10 (tpy – uncontrolled)</b>
CD-DF1	Sanding	91.3	23.80	21.72
	Rough Sawing	91.3	1.89	1.72
	Fine Sanding	91.3	0.37	0.34
CD-DF2	Sanding	91.3	23.80	21.72
	Rough Sawing	91.3	1.89	1.72
	Fine Sanding	91.3	0.37	0.34
CD-DF3	Sanding	91.3	23.80	21.72
	Rough Sawing	91.3	1.89	1.72
	Fine Sanding	91.3	0.37	0.34

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

## **VII. Facility Wide Air Toxics**

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

## **VIII. Statement of Compliance**

The DAQ has reviewed the compliance status of this facility. Based on visual observations and review of records at the time of the inspection, this facility was judged to be operating in compliance with Air Quality standards and regulations.

## **IX. Facility Emissions Review**

There is no change in emissions for this application.

## **X. Stipulation Review**

ARO does not request any additional stipulation modifications.

**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.

**XII. Conclusions, Comments, and Recommendations**

ARO recommends issuance of revised permit as requested. RCO concurs with this decision. ARO does not request that a DRAFT permit be reviewed prior to issuance.