

AIR PERMIT REVIEW

APPLICANT: Lexington Furniture Industries Plant 5	SITE LOCATION: Lexington	COUNTY: Davidson	
TECHNICAL CONTACT: Stuart Stapleton	PHONE: (336) 236-5316	RESPONSIBLE OFFICIAL: Bill Mitchell	TITLE: Vice President – Manufacturing
REVIEW ENGINEER: Mark Cuilla	SIGNATURE:	DATE: date, 2004	
REGIONAL CONTACT: Jalal Adouli	REGIONAL OFFICE: WSRO	SIC CODE: 2511	
APPLICATION NUMBER: 2900179.04A	EXISTING PERMIT NUMBER: 04015T11	NEW PERMIT NUMBER: 04015T12	

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. 5 is a furniture manufacturer located in Lexington, Davidson County, North Carolina. This is a wooden furniture manufacturing facility. Standard hours of operation are 8 hours per day, 5 days per week, and 50 weeks per year.

III. History/Background/Application Chronology

January 20, 2004 – Permit 04015T11 issued for renewal of the permit.

April 30, 2004 – Application received requesting removal of CAM applicability to the wood working operations.

May 25, 2004 – DRAFT permit sent to title V coordinator for review. WSRO did not request a DRAFT permit prior to issuance.

IV. Permit Modification/Changes

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Change(s)
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
5	2.1 A.1.c	-modified paragraph title

Page(s)	Section	Description of Change(s)
11	2.1 C.3.e	-modified reporting period from quarterly to semi-annually per EPA guidance and Permittee request
13	2.1 E (table) 2.1 E.3.a-d	-removed CAM requirements per demonstration
18	2.1 I (table) 2.1 I.3.a-d	-removed CAM requirements per demonstration
22	2.1 J.4.d	-modified reporting period from quarterly to semi-annually per EPA guidance and Permittee request
32	General Condition H	-amended to add definition of "Section 502(b)(10) changes" per EPA guidance
33	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 Kb
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 is currently subject to New Source Performance Standards, Subpart Kb (ES4-T1). This significant modification 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. Continued compliance is expected.

PSD

This facility is currently a PSD major facility. It currently operates under two separate PSD avoidance conditions. This application does not add any new requirements. Continued compliance is expected.

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 and finger-jointing operations (ES4-WD1, ES5-WD1, and ES4-WD1A, respectively) 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.

Control Device ID	Process Description	Particulate (tpy)	% PM10*	PM10 (tpy – uncontrolled)
CD4-DF1	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF2	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF3	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF4	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF5	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF6	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF7	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF8	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD4-DF9	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD5-DF1	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD5-DF2	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13
CD5-DF3	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13

Control Device ID	Process Description	Particulate (tpy)	% PM10*	PM10 (tpy – uncontrolled)
CD5-DF4	Sanding	35.0	23.80	8.34
	Rough Sawing	35.0	1.89	0.66
	Fine Sanding	35.0	0.37	0.13

* Percent PM10 based on NC wood working emission spreadsheet (planning 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. The following table represents facility wide emissions as submitted by the facility in its latest* emissions inventory:

Pollutant	2001 Emissions (tons)
Particulate	17.32
Carbon Monoxide	39.22
Nitrogen Oxides	35.01
Sulfur Dioxide	20.98
Volatile Organic Compounds	73.91
Ethyl Acetate	8950 (pounds)
(all other HAPs/TAPs)	26392.30 (pounds)

X. Stipulation Review

WSRO did not request additional stipulation modification.

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

WSRO recommends issuance of permit as requested and did not request a DRAFT prior to issuance. RCO concurs with this decision.