

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: Date, 2005

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100876
Inspector's Name: Steve Moser
Date of Last Inspection: 05/11/2005
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Miller Desk Inc Facility Address: Miller Desk Inc 1212 Lincoln Drive High Point, NC 27262 SIC: 2521 / Wood Office Furniture NAICS: 337211 / Wood Office Furniture Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 15A NCAC 2D .1806 as a replacement for 2D .0522 NSPS: NESHAP: 40 CFR 63, Subpart DDDDD PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100876.04A Date Received: 09/30/2004 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03813/T10 Existing Permit Issue Date: 07/25/2003 Existing Permit Expiration Date: 07/01/2005
Bobby Miller Executive Vice President (336) 819-6432 P O Drawer HP-11 High Point NC, 27261	Felix Miller, III President (336) 819-6442 1212 Lincoln Drive High Point NC, 27261	Michele Payne Director of Human Resources (336) 819-6419 1212 Lincoln Drive High Point NC, 27262	
Review Engineer: Mark Cuilla Review Engineer's Signature: Date:		Comments / Recommendations: Issue 03813/T11 Permit Issue Date: Date, 2005 Permit Expiration Date: Date, 2010	

I. Purpose of Application

Miller Desk, Inc., is currently operating under expired permit 03813T10. This permit expired on March 31, 2005, but because the Permittee submitted a timely renewal application, the permit remains in effect until renewed. Per the requirements of the permit, an application for renewal was due by September 30, 2004. This application completes that requirement. The permit is deemed complete for processing. The Permittee did not request any modifications to the permit as part of this renewal process.

II. Facility Description

The facility manufactures wooden furniture and currently operates one shift, five days per week and 51 weeks per year.

III. History/Background/Application Chronology

September 30, 2004 – Permit application **4100876.04A** was received for the renewal of the Title V permit. The application was deemed complete for processing.

April 23, 2005 – DRAFT permit sent to Permittee, regional office and title V coordinator prior to public notice and EPA review.

IV. Permit Modifications/Changes

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-added MACT Subpart requirements and citations -amended boiler (ID No. IES-2) Btu rate per regional office inspection report
Cover	-	-amended permit revision numbers and all dates
TOC	-	-amended shell titles -removed reference to Part II Sections
3	- Equipment table	-amended shell title -added MACT Subpart citations -amended description of ES-5 -removed asterisk and asterisked language associated with ES-6
4	2.1 A (table) 2.1 A.1.b.ii	-added MACT Subpart citation -updated shell language
5	2.1 A.1.c 2.1 A.1.e 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e	-updated shell language -updated shell language -added equipment ID numbers and updated shell language -updated shell language -updated shell language
6	2.1 B (table) 2.1 C.1.b 2.1 C.1.c 2.1 C.1.e	-added MACT Subpart citation -added equipment ID numbers and updated shell language -updated shell language -updated shell language
7	2.1 C.2.c 2.1 C.2.d 2.1 C.2.e 2.1 D (table)	-updated shell language -updated shell language -updated shell language -added MACT Subpart citation
15	2.2 B	-updated shell language
16-24	General Conditions	-updated shell conditions
25-27 (old permit)	Part II	-removed section

The following table describes the modifications to ESM as a result of this renewal process.

Current permit description(s)	Description(s) as a result of this renewal
One natural gas-fired boiler (5.2 million Btu per hour heat input capacity; ID No. IES-2)	One natural gas-fired boiler (7.86 million Btu per hour heat input capacity; ID No. IES-2)
Woodwaste collection system (ID No. ES-5)	Woodworking operations (ID No. ES-5)

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart JJ)
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

No regulatory review is required for these existing permit conditions as part of the renewal process.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not subject to any applicable NSPS requirements. This renewal action does not change this status.

NESHAPS/MACT – The facility is currently subject to 40 CFR 63, Subpart JJ, National Emission Standard for Wood Furniture Manufacturing Operations. This renewal action does not change this status.

As part of this renewal, the facility's sources were evaluated for additional MACT Subpart requirements. It was determined that the two insignificant boilers (**ID Nos. IES-1 and IES-2**) are subject to 40 CFR 63, Subpart DDDDD, National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters. However, because it is an existing, small, natural gas-fired boiler, **IES-2** has no requirements per 63.7506(c). In addition, because it is an existing, large, natural gas-fired boiler, **IES-1** has to only submit an initial notification of applicability to indicate compliance with this Subpart. This renewal application completes this requirement.

It should be noted that in the latest inspection report WSRO comments that:

The two boilers are listed as insignificant activities on the permit. The heat inputs of both boilers, as listed on the permit seem to be slightly off. The small of the two boilers is a York Shipley boiler with a heat input of 7865 Mbh, which is 7.86 million Btu. This boiler is no longer in use. Continental manufactures the larger boiler. Although it currently burns only natural gas, it is rated to burn up to 90 gallons per hour of No. 2 fuel oil. At 141000 Btu per gallon (per Exxon's flashnote document) the boiler heat input would be 12.69 million Btu per hour. On the permit these two boilers are listed as 5.2 and 10.35 million Btu per hour heat input respectively. This heat input discrepancy should be corrected the next time the permit is reopened."

After a discussion of this comment with Steve Moser, it was decided that the smaller boiler's heat input rate would be changed as the plate suggests, but that the larger would not. The modification is not required, because the physical design of the burners does not allow for any fuel other than natural gas. The current heat input level is correct for natural gas.

PSD – The facility is not subject to any applicable PSD requirements. This renewal action does not change this status.

112(r) – The facility is not subject to 112(r) requirements because it does not store any of the covered chemicals. This renewal action does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. Particulate matter emissions from the woodworking operations (**ID No. ES-5**) are controlled by one pneumafil bagfilter in series with one simple cyclone. These operations are subject to the particulate matter standard of 15A NCAC 2D .0512 which requires adequate ductwork and properly designed collectors. The facility argues that no compliance assurance monitoring (CAM) plan is required because potential PM-10 emissions before control are less than 100 tons per year. A historical look at throughput indicates an average of 219 board feet per hour. Assuming:

Potential throughput of 700 board feet per hour; and
10% waste to the dust system,

the woodworking spreadsheet estimates potential pre-controlled PM-10 emissions at 71.13 tons per year. Therefore, no CAM is required for the applicable control devices.

VII. Facility Wide Air Toxics

The facility is not currently subject to air toxics permit conditions. This renewal does not affect this status. The facility is also not currently subject to the last MACT/air toxics demonstration requirements per 15A NCAC 2Q .0705 because of the exemptions written into the rule for sources subject to the furniture MACT and all combustion sources subject to the combustion MACT.

VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2003 Actual Emissions (tpy)
CO	0.23
NO _x	0.27
PM-10	0.59
SO ₂	NA
VOC	62.91
HAPs	8.19

IX. Stipulation Review

There are no necessary permit stipulation modifications as a result of this permit renewal action.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 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 15A NCAC 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. There are no affected States or local programs.

XI. Conclusions, Comments, and Recommendations

WSRO recommends issuance of renewed permit and was presented with a DRAFT permit prior to notice and EPA review.

RCO concurs with the issuance of the renewed permit as amended.