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| NORTH CAROLINA DIVISION OF AIR QUALITY <p style="text-align: center;">Air Permit Review</p> | | Region: Mooresville Regional Office County: Catawba NC Facility ID: 1800180 Inspector's Name: Angela Hall Date of Last Inspection: 08/03/2004 Compliance Code: C/In Compliance With Procedural Reqr | |
| Permit Issue Date: | | Permit Applicability (this application only) SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: Specific MACT avoidance language added. | |
| Facility Data Applicant (Facility's Name): Progressive Furniture Inc Facility Address: Progressive Furniture Inc 2555 Penny Road Claremont, NC 28610 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 | | Application Data Application Number: 1800180.05A Date Received: 02/15/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05810/T15 Existing Permit Issue Date: 02/18/2005 Existing Permit Expiration Date: 12/31/2006 | |
| Contact Data | | | |
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| Review Engineer: Mike Benson Review Engineer's Signature: Date: | | Comments / Recommendations: Issue 05810/T16 Permit Issue Date: Permit Expiration Date: | |

I. Introduction:

Progressive Furniture Inc., located in Claremont, North Carolina currently holds Title V Permit No. 05810T15, with an expiration date of December 31, 2006. The application was submitted to apply for renewal of the existing Title V Air Permit. This renewal permit will be issued as Permit No. 05810T16. Application No. 1800180.05A was received by the DAQ on February 15, 2005. The application was deemed incomplete on March 28, 2005, and a request for information was sent to the Company's consultant (Updated facility emissions, CAM applicability).

II. Proposed changes in Application 1800180.05A.

1. Addition of Section 2.3.A, specific MACT avoidance language.

III. Specific changes to existing Title V Air Permit No. 05810T15:

| Page | Section | Comments |
|-------------------|---------------|---|
| Table of Contents | n/a | Addition of Section 2.3. |
| 3 | Part I, table | Changed description of the roll printers to accurately reflect what is physically at the Company. |
| 5 | 2.1.A (table) | 2D .0530 reference changed to qQ .0317 reference. |
| 10 | 2.1.D (table) | 2D .0530 reference changed to qQ .0317 reference. |
| 12 | 2.2.A | Changed description of the roll printers to accurately reflect what is physically at the Company. |
| 14 | 2.2.B | Changed description of the roll printers to accurately reflect what is physically at the Company. |
| 17 | 2.3.A | Added specific MACT avoidance. |

IV. Facility Description:

This facility manufactures particle board furniture.

V. Statement of Compliance:

This facility was inspected by Ms. Angela Hall of MRO on August 3, 2004. The facility was in full operation at the time of the inspection (except for a couple of spray booths and dip tanks), and was determined to be in compliance with applicable Air Quality regulations.

VI. Permitted Emissions Sources and Associated Air Pollution Control Devices and Appurtenances:

| Emission Source ID No. | Emission Source Description | Control Device ID No. | Control Device Description |
|-------------------------|---|-----------------------|--|
| ES-3 and ES-4 | two wood dust collection systems | CD-3 and CD-4 | two bagfilters (7,045 square feet of filter area and 3,591 square feet of filter area, respectively) |
| ES-5 | panel line wood material collection system | CD-5 | one bagfilter (5,034 square feet of filter area) |
| ES-6 | natural gas/ No.2 fuel oil-fired boiler (10.461 million Btu per hour heat input capacity) | NA | NA |
| ES-7 to ES-13 and ES-17 | seven dry filter-type spray booths (Nos. ES-7 to ES-13) and one steam-heated bake oven (No. ES-17) installed on a wood furniture painting operation | NA | NA |

| Emission Source ID No. | Emission Source Description | Control Device ID No. | Control Device Description |
|--------------------------------|--|------------------------------|--|
| ES-14 to ES-16, ES-18 to ES-20 | one stain applicator (No. ES-14), one (1) two roll printer (No. ES-15A), one (1) three roll printer (ID No. ES-15B), one sealer applicator (No. ES-16), and three electric-heated bake ovens (Nos. ES-18, ES-19 and ES-20) installed on a wood furniture printing operation. | NA | NA |
| ES-21 to ES-27 | five dry filter type spray booths (Nos. ES-21 to ES-25) and two electric bake ovens (Nos. ES-26 and ES-27) installed on a wood furniture spray painting operation | NA | NA |
| ES-28 | one fill machine | NA | NA |
| ES-29 and ES-30 | two wood dust collection systems | CD-6 and CD-7 | two bagfilters (7,163 sq.ft. of filter area and 5,869 sq.ft. of filter area, respectively) |
| ES-31 and ES-32 | two 4,000 gallon storage tanks | NA | NA |
| ES-33 | touchup coatings spray cans | NA | NA |
| ES-34 | adhesives for assembly | NA | NA |
| ES-35 | dry filter-type spray booth installed on a wood furniture spray painting operation | NA | NA |
| ES-36 | dry filter-type spray booth installed on a wood furniture spray finishing operation | N/A | N/A |
| F-1A, F-1B, F-1C, and F-1D | four coating dip tanks | NA | NA |
| F-2 | laminator | NA | NA |
| F-3 | silk screen machine | NA | NA |
| F-4 | print line vat | NA | NA |
| F-5 | spray lines buckets | NA | NA |

NOTE: The equipment list was modified to reflect what is actually at the facility. The steam-heated bake oven (ID No. ES-20) was replaced by an electric-heated bake oven. The roll coaters have been in existence as-is, but were described incorrectly in previous permits.

Old Description:

| | | | |
|-----------------------------------|--|----|----|
| ES-14 to ES-16, ES-18 to ES-20 | one stain applicator (No. ES-14), two (2) three roll printers (No. ES-15A), one (1) three roll printer (ID No. ES-15B), one sealer applicator (No. ES-16), two electric-heated bake ovens (Nos. ES-18, ES-19), and one steam-heated bake oven (ID No. ES-20) installed on a wood furniture printing operation. | NA | NA |
|-----------------------------------|--|----|----|

New Description:

| | | | |
|-----------------------------------|--|----|----|
| ES-14 to ES-16, ES-18 to ES-20 | one stain applicator (No. ES-14), one (1) two roll printer (No. ES-15A), one (1) three roll printer (ID No. ES-15B), one sealer applicator (No. ES-16), and three electric-heated bake ovens (Nos. ES-18, ES-19 and ES-20) installed on a wood furniture printing operation. | NA | NA |
|-----------------------------------|--|----|----|

VII. Emission Source-By-Source Evaluation:

A. Natural gas/ No. 2 fuel oil-fired boiler (ID No. ES-6)

1. Description: One natural gas/No. 2 fuel oil-fired boiler used to produces process heat (10.461 million Btu per hour maximum heat input).
2. Applicable Regulatory Requirements:
 - 15A NCAC 2D .0503
 - 15A NCAC 2D .0516
 - 15A NCAC 2D .0521
 - 15A NCAC 2Q .0317 (PSD avoidance for VOC)

No regulatory review is required at this time since there are no new applicable regulations for this source under this permit renewal.

B. Wood dust collection systems (ID Nos. ES-3, ES-4, ES-29, and ES-30) with associated bagfilters (ID Nos. CD-3, CD-4, CD-6, and CD-7), respectively.

1. Description: Wood furniture finishing operations and associated collection equipment and control devices (bagfilters).
2. Applicable Regulatory Requirements:
 - 15A NCAC 2D .0512
 - 15A NCAC 2D .0521

No regulatory review is required at this time since there are no new applicable regulations for this source under this permit renewal.

C. Panel line wood material collection system (ID No. ES-5) with associated bagfilter (ID No. CD-5)

1. Description: Wood panel manufacturing equipment and associated control device (bagfilter).

2. Applicable Regulatory Requirements:

- 15A NCAC 2D .0512
- 15A NCAC 2D .0521

No regulatory review is required at this time since there are no new applicable regulations for this source under this permit renewal.

D. Fourteen dry filter-type spray booths (ID Nos. ES-7 thru ES-13, ES-21 thru ES-25, ES-35 and ES-36)

1. Description: Fourteen dry filter-type paint/stain/coating booths used to finish wood furniture.

2. Applicable Regulatory Requirements:

- 15A NCAC 2D .0512
- 15A NCAC 2D .0521
- 15A NCAC 2D .0958
- 15A NCAC 2D .0711
- 15A NCAC 2Q .0317 (PSD avoidance for VOC)
- 15A NCAC 2Q .0803 (MACT avoidance)

No regulatory review is required at this time since there are no new applicable regulations for this source under this permit renewal.

VIII. Compliance Assurance Monitoring (CAM):

CAM does not apply. Information was submitted by the Company, based on DAQ approved spreadsheets that demonstrated no PSEU has potential particulate PM10 emissions over 100 TPY. The results are summarized in the following table.

| PSEU | Potential PM10 Emissions, TPY |
|-------------|--------------------------------------|
| ES-3 | 9.54 |
| ES-4 | 9.54 |
| ES-5 | 1.82 |
| ES-29 | 20.82 |
| ES-30 | 1.41 |

IX. NSPS Issues:

This facility is not subject to NSPS.

X. PSD/NAA Issues:

This facility has four separate limits to avoid the applicability of PSD for VOC emissions. Compliance with each limit is recorded by the Company on a monthly basis. The Company submits semi-annual reports to the Division, showing that VOC emissions are below each respective limit on a 12-month rolling average. The limits are given in the table below.

| ID No. Sources | Regulated material | Emission Limitation |
|---|----------------------------|---|
| <u>PSD Limit One</u> ES-6, ES-7 thru ES-13, ES-14, ES-15, ES-16, ES-17, ES-18, ES-19, ES-20, ES-28, ES-31, ES-32, ES-33, ES-34, F-1A thru F-1D, F-2,F-3, F-4 and F-5 | volatile organic compounds | less than 250 tons per consecutive 12 months |
| <u>PSD Limit Two</u> ES-21 thru ES-27 | volatile organic compounds | less than 250 tons per consecutive 12months |
| <u>PSD LimitThree</u> ES-35 | volatile organic compounds | less than 40 tons per consecutive 12months |
| <u>PSD Limit Four</u> ES-36 | volatile organic compounds | less than 40 tons per consecutive 12months |

XI. MACT Issues:

The facility currently has in place a 10/25 TPY limit for Federal Hazardous Air Pollutants to avoid applicability of 40 CFR Part 63, Subparts JJ, DDDD, QQQQ, and DDDDD. The Company is required to keep monthly records of HAP emissions, and submit semi-annual reports to the Division demonstrating compliance on a 12-month rolling average.

XII. 112(r) Issues:

This facility is not subject to 112(r).

XIII. Facility-Wide Air Toxics:

The facility is subject to 2Q .0711 for ethyl acetate, MEK, MIK, manganese, toluene, and xylene. Compliance is indicated.

XIV. Facility Emissions Summary:

Criteria pollutant emissions were obtained from the 2003 emissions inventory submitted to the Division.

| Pollutant | Actual Emissions, TPY |
|-----------|-----------------------|
| CO | 0.84 |
| NOx | 1.00 |
| PM | 4.39 |
| PM10 | 2.74 |
| PM2.5 | 2.48 |
| SO2 | 0.01 |
| VOC | 253.16 |

The three HAPs with the largest emissions are xylene (7.6 TPY), toluene (3.48 TPY) and MEK (1.86 TPY). Total HAP emissions are less than 15 TPY.

XV. Miscellaneous:

1. A consistency determination was not required for this renewal application.
2. A Professional Engineer seal was not required for this application.
3. An application-processing fee was not required for this application.
4. A 30-day public notice is required for this application. This application will also be submitted for a 45-day EPA review concurrent to the public notice period. South Carolina and Mecklenburg County are effected states.

XVI. Conclusions, Comments, and Recommendations.

This Air Permit issued as a renewal permit for Progressive Furniture Inc., located in Claremont, North Carolina has been reviewed by the DAQ to determine compliance with all procedures and requirements. The DAQ has determined that this facility is complying with all applicable requirements.

Issue Air Quality Permit No. 05810T16 to Progressive Furniture Inc.