

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: XX

Region: Winston-Salem Regional Office
County: Wilkes
NC Facility ID: 9700003
Inspector's Name: Eric Hudson
Date of Last Inspection: 09/01/2004
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)	
Applicant (Facility's Name): American Drew Plant #14 Facility Address: American Drew Plant #14 400 Elkin Highway North Wilkesboro, NC 28659 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: PSD: PSD Avoidance: NC Toxics: 112(r): Other:	
Contact Data			Application Data	
Facility Contact	Authorized Contact	Technical Contact	Application Number: 9700003.04A Date Received: 08/25/2004 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 00978/T10 Existing Permit Issue Date: 12/01/2000 Existing Permit Expiration Date: 05/31/2005	
Stephanie St. Pierre Environmental Manager (336) 651-9479 P O Box 489 North Wilkesboro NC, 28659	Michael Hyatt Vice President of Operations (336) 651-9412 P.O. Box 489 North Wilkesboro NC, 28659	Stephanie St. Pierre Environmental Manager (336) 651-9479 P O Box 489 North Wilkesboro NC, 28659		
Review Engineer: Kevin Godwin Review Engineer's Signature: _____ Date: XX		Comments / Recommendations: Issue 00978/T11 Permit Issue Date: Permit Expiration Date:		

1. Purpose of Application

This revision is a renewal of existing Title V permit 00978T10 pursuant to 15A NCAC 2Q .0513. The existing Title V permit was issued on December 1, 2000 as a modification to the initial Title V permit and is set to expire on May 31, 2005. The renewal application was received on August 25, 2004 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewed permit has been either issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewed permit has been issued or denied.

2. Facility Description

American Drew, Inc. manufactures wooden chairs at Plant 14. Plant No. 14 is one of three American Drew wood furniture manufacturing facilities located in North Wilkesboro. Processes include woodworking, finishing, and steam generation. Woodworking operations consist of lumber drying, sawing, machining, and sanding. Fabricated furniture is finished with a variety of stains, sealers, and lacquers.

As noted in the latest inspection report, the trend in the furniture industry is to import parts from Asia. According to the inspection report, Plant 14 manufacturing operations have been reduced dramatically. Prefinished, imported, parts are assembled and some pieces may require touch up to their finish. Finally, the chairs are packaged for shipment. The boilers still operate 24 hours per day to provide steam for the lumber kilns. Most of the rough-end and woodworking equipment had been removed and much of the dust system was shut down in December 21, 2001.

3. Permit Modification/Changes

The initial Title V permit was issued on June 1, 2000.

Pursuant to 15A NCAC 2Q .0523, a 502(b)(10) change was made to issue Permit revision (0978T10) on December 1, 2000 for the addition of two dip tanks (ID Nos. DT-1 and DT-2) and one wash-off tank (ID No. T02). This equipment was included in Part II. According to the applicant, the dip tanks (ID Nos. DT-1 and DT-2) have since been removed from the plant. Since this permit renewal is being noticed to the public and EPA, Part II is removed and all equipment is included in Part I.

In the cover letter to the renewal application, the applicant is requesting that the following equipment be omitted from the permit as it has been removed from the facility or is no longer in operation:

- Two transfer cyclones (168 inches and 76 inches in diameter, ID Nos. C-1 and C-2, respectively) and one bagfilter (2,008 square feet of filter area, ID No. BH-2),
- Three bulk finishing material storage tanks (ID Nos. ST-1, ST-2 and ST-3), and
- One gluing operation (ID No. G-1).

According to Comments and Recommendations from WSRO, testing of the wood fuel-fired boilers was conducted on May 15, 2001. The testing requirement found in Section 2.1 A.1.b. has been satisfied and is removed upon this renewal.

4. Application Chronology

August 25, 2004	Received renewal application from American Drew, Inc.
September 20, 2004	Received Comments and Recommendations from Winston-Salem Regional Office (WSRO).
December 9, 2004	Presented draft to Title V Permit Coordinator.
December 21, 2004	E-mailed draft permit and review to WSRO. Region responded on December 23 with comments regarding one typo and update of visible emissions monitoring condition (Spec. Cond. 2.1A.3.c.).
December 28, 2004	E-mailed draft permit and review to applicant.
January 13, 2005	Received E-mail comments from applicant.
January 18, 2005	Made corrections and prepared draft permit for public notice.

5. Regulatory Review

American Drew, Inc. Plant 14 is subject to the following regulations:

- 15ANCAC 2D .0504 "Particulates from Wood Burning Indirect Heat Exchangers"
- 15A NCAC 2D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"
- 15A NCAC 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
- 15A NCAC 2D .0521 "Control of Visible Emissions"
- 15A NCAC 2D .0535 "Excess Emissions Reporting and Malfunctions"

15A NCAC 2D .1111 “Maximum Achievable Control Technology – Subpart JJ and Subpart DDDD”
 15A NCAC 2D .1806 “Control and Prohibition of Odorous Emissions”

Below is a summary of potential facility-wide criteria pollutant emissions based on 2003 emissions inventory information.

Pollutant	Emission Rate (tpy)
Carbon monoxide	36.13
Nitrogen oxides	32.12
Particulate matter less than 10 microns	5.05
Sulfur dioxide	195.00
Volatile organic compounds	1110.78

The following table summarizes the changes to the existing permit:

Pages	Section	Description of Change
	Entire Permit, where applicable	Changed reference from “Air Quality Title V Operation Permit” to “Air Quality Federal Title V and State Operation Permit” and “Air Quality Construction and Operation Permit” to “Air Quality State Operation Permit”
Cover letter	Cover letter	Modified to reflect current permit number, issue and effective date, and associated application information.
	Attachment	Added table with changes to Title V as Attachment
4	Section 1 Table of Emission Sources	Changed description of wood dust collection system to read “Wood dust collection system consisting of separate group processes”
4	Section 1 Table of Emission Sources	Removed two cyclones (ID No. C-1 and C-2) and one bagfilter (ID No. BH-2) as they have been removed from the facility
4	Section 1 Table of Emission Sources	Removed three bulk finishing storage tanks (ID Nos. ST-1, ST-2, and ST-3) as the have been taken out of service.
4	Section 1 Table of Emission Sources	Removed gluing operation (ID No. G-1) as it is applied by hand with no direct emissions outside and does not require permitting
6	Section 2.1 A.1.b.	Removed testing requirement for the wood fuel –fired boilers as has testing has been conducted.
	Section 3	Updated with most recent General Conditions and List of Acronyms

6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), and CAM

NSPS

New Source Performance Standards do not apply to this facility.

NESHAPS

American Drew, Inc. Plant 14 is subject to 40 CFR Part 63, Subpart JJ “National Emissions Standard for Wood Furniture Manufacturing Operations.” The wood furniture finishing operations must comply with all the requirements of Subpart JJ and 15A NCAC 2D .1111 “Maximum Achievable Control Technology.” The existing permit contains the standard Subpart JJ condition.

The lumber drying kilns at Plant 14 are subject to 40 CFR Part 63 Subpart DDDD. This subpart requires initial notification by January 26, 2005.

PSD

Based on potential VOC emissions this facility is classified as PSD major.

Attainment Status

Wilkes County is in attainment for all pollutants.

112(r)

Based on the most recent inspection report, American Drew, Inc. Plant 14 does not have any sources that are subject to Section 112(r) of the 1990 CAAA.

CAM

A compliance assurance monitoring (CAM) determination is required for this renewal because: (1) the facility is a Title V source with potential emissions that exceed the Title V major source thresholds without considering controls; and (2) there are sources subject to an emission standard that require controls in order to comply with that standard. The applicant provided a CAM applicability determination in the cover letter to the renewal application. According to the applicant, the four emission sources that are potentially subject to CAM are furniture finishing operations (ID No. F-1), two wood fuel-fired boilers (8.0 and 12.0 million Btu per hour heat input rate, ID Nos. ES1 and ES-2, respectively), and the wood dust collection system (ID No. WW-1). The following exemptions apply:

Wood products finishing operations (ID No. F-1) are exempt because they are subject to 40 CFR Part 63, Subpart JJ, which is a Section 112 standard promulgated after 11/15/90.

Two wood fuel-fired boilers (ID Nos. ES-1 and ES-2) are exempt since potential uncontrolled PM₁₀ emissions are less than 100 tons per year. Emissions calculations are based on DAQ accepted Wood Waste Combustion Calculator Spreadsheet for a stoker boiler firing dry wood (< 19% m.c.). PM₁₀ emissions from the 12.0 million Btu per hour boiler are 19.82 tons per year.

Woodworking operations (ID No. ES9) are exempt because potential uncontrolled PM₁₀ emissions are less than 100 tons per year. Emissions calculations are based on DAQ accepted Woodworking Emissions Calculator Spreadsheet. As stated in the cover letter, dust generated from the operation in 2003 was approximately 43.5 tons. Assuming 8760 hours of operation, dust potentially generated from the router operation is 98.5 tons, and from the wood hog is 854 tons. Potential PM₁₀ emissions are 1.85 tons per year.

Therefore, the facility is exempt from the requirements of CAM.

7. Facility-wide Air Toxics

An increase in facility-wide TAP emissions is not expected. The existing permit does not contain any conditions relating to TAP emissions.

8. Facility Compliance Status

The DAQ has reviewed the compliance status of this facility. American Drew, Inc. Plant 14 was last inspected on September 1, 2004 by Mr. Eric Hudson (WSRO). American Drew was found to be in compliance with the requirements of the permit. A Notice of Violation was issued on September 10, 2004 due to late submittal of a semiannual MACT report.

The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

9. Stipulation Review

Pursuant to 40 CFR 63.2280, a new stipulation requiring initial notification for the lumber drying kilns is included in this permit renewal. All other stipulations are standard for this type of facility.

10. Public Notice/EPA and Affected States 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 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. Tennessee and Virginia are affected states for this facility.

Public notice of the DRAFT Title V permit was published in the XX on XX and the public comment period ran from XX through XX.

11. Conclusions, Recommendations, and Comments

The renewal Title V application for American Drew, Inc. Plant 14 has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. Upon completion of public notice and EPA review periods, the DAQ proposes to issue the Title V permit renewal.

12. Miscellaneous Requirements

PE Seal

Pursuant to 2Q .0112, no PE Seal was required because the permit renewal does not involve the determination of applicability and appropriateness or performance of air pollution capture and control systems [15A NCAC 2Q .0112(b)(2) and (3)].

Zoning

A request for zoning consistency determination is not required for this permit renewal.

Fee Classification

Based on potential to emit, this facility has been classified as **Title V Major**. The facility's current IBEAM status is **Title V Major**. This renewal **will not** change the fee classification.