

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: DRAFT

Region: Winston-Salem Regional Office
County: Randolph
NC Facility ID: 7600139
Inspector's Name: Ray Stewart
Date of Last Inspection: 11/18/2004
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): B & H Panel Company Facility Address: B & H Panel Company 230 West Academy Street Asheboro, NC 27204 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: 7600139.04A Date Received: 03/10/2004 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06559/T07 Existing Permit Issue Date: 09/22/2004 Existing Permit Expiration Date: 12/31/2004
Herb Mitchell President (336) 629-2828 230 West Academy Street Asheboro NC, 27204	Herb Mitchell President (336) 629-2828 230 West Academy Street Asheboro NC, 27204	Herb Mitchell President (336) 629-2828 230 West Academy Street Asheboro NC, 27204	
Review Engineer: Kevin Godwin Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 06559/T08 Permit Issue Date: Permit Expiration Date:	

1. Purpose of Application

This revision is a renewal of existing Title V permit 06559T07 pursuant to 15A NCAC 2Q .0513. The existing Title V permit was issued on September 22, 2004 as a modification to the initial Title V permit and is set to expire on December 31, 2004. The renewal application was received on March 10, 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

B & H Panel Company manufactures wood furniture components at this Asheboro site. Processes include woodworking and finishing to produce bed rails. Woodworking equipment that vents to a simple cyclone control device includes the following: one rough cut saw, three sanders, two planers, one tinter (similar to a planer), and one profiler (similar to a molder). Several other woodworking sources are not controlled but vent inside the manufacturing building. The applicant states that the total amount of wood waste collected by the cyclone was: 133 tons in 2001, 143 tons in 2002, and 109.8 tons in 2003.

3. Permit Modification/Changes

The initial Title V permit was issued on January 21, 2000.

Pursuant to 15A NCAC 2Q .0523, a 502(b)(10) change was made to issue Permit revision (06559T07) on September 22, 2004 for the construction of a new flatline spraying operation (ID No. ES35).

4. Application Chronology

March 10, 2004	Received renewal application from B&H Panel Company.
March 24, 2004	Received Comments and Recommendations from Winston-Salem Regional Office (WSRO).
September 20, 2004	Sent letter to applicant requesting compliance assurance monitoring (CAM) applicability analysis.
September 22, 2004	Issued Permit No. 06559T07 for construction of new flatline spraying operation.
November 29, 2004	Discussed CAM applicability issues with applicant and agreed to use best available emissions data from American Furniture Manufacturing Association (AFMA) based on source testing of similar facilities.
December 2, 2004	Sent draft permit and review to applicant and WSRO.

5. Regulatory Review

B&H Panel Company is subject to the following regulations:

- 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"
- 15A NCAC 2D .1806 "Control and Prohibition of Odorous Emissions"
- 15A NCAC 2Q .0317 "Avoidance Conditions for avoidance of 15A NCAC 2D .0530 (PSD)"
- 15A NCAC 2Q .0711 "Toxic Air Pollutant Emissions Limitation and Requirement"

Below is a summary of facility-wide criteria pollutant emissions based on 2002 emissions inventory information.

Pollutant	Emission Rate (tpy)
Carbon monoxide	2.31
Nitrogen oxides	2.75
Particulate matter less than 10 microns	145.02
Sulfur dioxide	0.02
Volatile organic compounds	110.7

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
3	Section 1 Table	Changed description of wood dust collection system to read “Wood dust collection system consisting of separate group processes”
9	Section 2.1 A. 3.	Included language requiring Permittee to establish normal visible emissions from the flatline spraying operation (ID No. ES35) within 30 days of operation.
9	Section 2.1 B.	Changed description of wood dust collection system to read “Wood dust collection system (ID No. ES9) consisting of separate group processes controlled by simple cyclone (ID No. CD9)”
	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

B&H Panel Company 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.

PSD

Based on potential VOC emissions this facility would be subject to PSD but has taken a federally enforceable limit to avoid being classified as PSD major. The existing permit contains a condition that limits VOC emissions from the furniture finishing operations to less than 250 tons per year. Existing monitoring and reporting requirements will remain to ensure VOC emissions are less than 250 tons per year.

Attainment Status

Randolph County is in attainment for all pollutants.

112(r)

Based on the most recent inspection report, B&H Panel Company 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 following exemptions apply:

Wood products finishing operations (ID Nos. ES1 through ES5, ES6, ES23, ES20, ES21, ES24, ES22, ES25, ES26, ES27, ES28 through ES32, ES33 and ES34) are exempt because they are subject to 40 CFR Part 63, Subpart JJ, which is a Section 112 standard promulgated after 11/15/90.

Woodworking operations (ID No. ES9) are exempt because potential uncontrolled PM₁₀ emissions prior to the control device are less than 100 tons per year. Emissions calculations are based on American Furniture Manufacturers Association (AFMA) letter regarding PM₁₀ Particle Size Distribution for Woodworking Operations. The total wood waste generated is determined by taking out the assumed 50% cyclone control efficiency and applying it to the worst case amount collected by the cyclone (i.e. 143 tons collected by cyclone * 2). Please see calculation method below.

Sanding:	(286 tons per year wood waste generated) * (0.0238) ¹ = 6.8 tons per year
Rough Saw:	(286 tons per year wood waste generated) * (0.0038) ¹ = 1.1 tons per year
Planer (fine saw):	(286 tons per year wood waste generated) * (0.0011) ¹ = 0.3 tons per year
Molding:	(286 tons per year wood waste generated) * (0.00) ¹ = <u>0.0 tons per year</u>
	Total PM ₁₀ = 8.2 tons per year

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

7. Facility-wide Air Toxics

The existing permit contains a condition limiting toxic air pollutant (TAP) emissions to the toxic permit emission rates (TPERs) as listed in 15A NCAC 2Q .0711. An increase in TAP emissions is not expected.

8. Facility Compliance Status

The DAQ has reviewed the compliance status of this facility. B&H Panel Company was last inspected on February 19, 2004 by Mr. Ray Stewart (WSRO). B&H Panel Company was found to be in compliance with the requirements of the permit.

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

No new stipulations are included in the permit upon this revision. All stipulations are standard for this type of facility.

10. Conclusions, Recommendations, and Comments

All applicable DAQ requirements should be met. I recommend issuance of the air permit.

¹ PM₁₀ weighted average for each different type of woodworking based on DAQ accepted source testing at similar facilities.

11. Miscellaneous Requirements

PE Seal

Pursuant to 2Q .0112, no PE Seal was required because the permit revision 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.