

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2009**

Region: Winston-Salem Regional Office
County: Randolph
NC Facility ID: 7600139
Inspector's Name: Ray Stewart
Date of Last Inspection: 01/14/2009
Compliance Code: 3 / 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: 7600139.09B Date Received: 09/18/2009 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06559/T08 Existing Permit Issue Date: 06/27/2005 Existing Permit Expiration Date: 05/31/2010
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: Mark Cuilla Review Engineer's Signature: Date: date, 2009		Comments / Recommendations: Issue 06559/T09 Permit Issue Date: date, 2009 Permit Expiration Date: date, 2014	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**06559T08**) was issued on **June 27, 2005**, and is currently scheduled to expire on **May 31, 2010**. The renewal application was received on **September 18, 2009**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a wood furniture component manufacturer.

III. History/Background/Application Chronology

January 20, 2000 – Permit **06559T06** issued as the first time Title V permit for this facility.

September 14, 2004 – Permit **06559T07** issued as a 502(b)(10) modification for the construction and operation of a new flatline sprayer.

June 27, 2005 – Permit **06559T08** issued as a renewal permit.

September 14, 2009 – Permit application **7600139.09A** was received as a 112j Part II application in response to DAQ’s 112j information/application requests mailed to each Title V facility.

September 18, 2009 – Permit application **7600139.09B** was received and deemed complete for processing.

October 2, 2009 – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

date, 2009 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Pages	Section	Description of Changes
Cover	-	-amended permit revision number and all dates
TOC	-	-removed all references to Part II
All	Header	-amended permit revision number
3	Equipment Table	-removed references to all equipment associated with Plant 2 per Permittee request -amended remaining equipment descriptions per current ESM guidelines
4	2.1 A 2.1 A (table) 2.1 A.1.b	-removed references to deleted equipment -added ID numbers to applicable regulations -added MACT Subpart title -added ID numbers
5	2.1 A.2.b 2.1 A.2.c 2.1 A.3.a 2.1 A.3.b	-corrected testing rule cross reference -added ID numbers -added ID numbers -corrected testing rule cross reference
6	2.1 A.3.c	-added ID numbers and updated shell language
6-7	2.1 A.4	-moved PSD avoidance condition to this Section from Section 2.2
7	2.1 B.1.b	-updated shell language
8	2.1 B.2.a 2.1 B.2.b 2.1 B.2.c	-added ID numbers -corrected testing rule cross reference -added ID numbers and updated shall language
9-15	2.2 A	-corrected ID numbers removing deleted equipment
16-26	General Conditions	-updated shell conditions (v3.0)

The following table indicates all modifications to the Emission Source Module as part of this permit renewal:

Current ESM Description	ESM Description following permit renewal
Three vacuum coaters (ID Nos. ES25, ES26, and ES27)	End-dated per Permittee request
Five baffle-type spray booths (ID Nos. ES28 through ES32)	End-dated per Permittee request
Two dip tanks (ID Nos. ES33 and ES34)	End-dated per Permittee request

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 .0516, Sulfur Dioxide Emissions from Combustion Sources
 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
 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)
 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these current permit conditions will not be included in this document.

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

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The Permittee currently subject to the Maximum Achievable Control Technology Standard for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ). This permit renewal does not affect this status.

PSD – The facility currently operates under a PSD Avoidance condition limiting facility-wide emissions of volatile organic compounds to less than 250 tons per year. To ensure compliance, the Permittee is required to calculate VOC emissions and record those results in a logbook monthly. The Permittee is also currently required to submit semi-annual reports of the monitoring and recordkeeping activities. This permit renewal does not affect this status.

112(r) – The 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. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance 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. The following table indicates all current equipment/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES9	Wood dust collection system consisting of separate group processes	CD9	One simple cyclone (96 inches in diameter)

This control device was analyzed for CAM applicability as part of the permit renewal application processing of **06559T08 (June 27, 2005)**. At that time, CAM was determined not to apply to this control equipment as potential pre-controlled PM₁₀ emissions were below the applicability threshold. For a complete discussion, see Kevin Godwin's Air Permit Review as noted above.

VII. Facility Wide Air Toxics

The Permittee has made a demonstration that the following toxic air pollutants (TAPs) are each below their respective emission rate (TPER) listed in 15A NCAC 2Q .0711:

Pollutant (CAS Number)	TPERs Limitations			
	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (Lb/hr)
Ammonia (7664-41-7)				0.68
Cresol (1319-77-3)			0.56	
Ethyl acetate (141-78-6)			36	
Formaldehyde (50-00-0)				0.04
Hydrogen chloride (7647-01-0)				0.18
Manganese		0.63		
Methyl ethyl ketone (78-93-3)		78		22.4
Methyl isobutyl ketone (108-10-1)		52		
n-hexane (110-54-3)		23		
Toluene (108-88-3)		98		
Xylene (1330-20-7)		57		

The Permittee is required to operate and maintain the facility in such a manner that emissions of any listed TAP will not exceed the TPER and must submit a permit application to amend this permit prior to exceeding any of the above listed TPERs. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	1.59	1.45
NO _x	1.86	1.69
PM ₁₀	3.37	3.81
SO ₂	0.01	0.01
VOC	94.37	102.11
Total HAPs/TAPs	11.22	17.11

IX. Stipulation Review

The facility was last inspected by Ray Stewart of the WSRO on **January 14, 2009**. Based on the findings of his compliance inspection, he found the facility "to be in likely compliance with its Title V Air Permit and all applicable regulations."

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. The Forsyth County Local Program is an affected area within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with WSRO's recommendation to issue the renewed air permit.