

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400022
Inspector's Name: Patrick Ballard
Date of Last Inspection: 08/03/2005
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Broyhill Miller Hill Complex Facility Address: Broyhill Miller Hill Complex 802 Complex Street Lenoir, NC 28645 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: X NSPS: NESHAP: X PSD: PSD Avoidance: X NC Toxics: X 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1400022.05A Date Received: 03/04/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02151/T22 Existing Permit Issue Date: 05/25/2005 Existing Permit Expiration Date: 02/28/2006
David Stout Corporate Environmental Manager (828) 758-3374 One Broyhill Park Lenoir NC, 28633	Bill Sale VP of Engineering and Manufacturing Sys (828) 758-3374 One Broyhill Park Lenoir NC, 28633	David Stout Corporate Environmental Manager (828) 758-3374 One Broyhill Park Lenoir NC, 28633	
Review Engineer: Wallace Pitts Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 02151/T23 Permit Issue Date: Permit Expiration Date:	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The initial Title V permit (02151T17) was issued on March 21, 2001 with an effective date of May 19, 2001, and an expiration date of February 26, 2006. The complete renewal application was received on March 4, 2005 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

This complex includes the Particleboard Plant, Wall Systems, Pacemaker Plant and Lenoir Chair Plant No. 1.

III. History/Background/Application Chronology

March 21, 2001 – Initial Title V Permit 02151T17 issued, effective date May 19, 2001.

April 16, 2001 – Administrative Amendment to 02151T17, issued as 02151T18, effective date May 19, 2001.

October 24, 2003 – 502(b)(1) amendment to 02151T18, issued as 02151T19. effective date October 24, 2003. Added dry filter-type spray booth, ES-S18.

August 18, 2004 – 502(b)(1) amendment to 02151T19, issued as 02151T20, effective date August 18, 2004. Added woodworking operations, ES-13 with associated bagfilter CD-58. Added particleboard manufacturing and woodworking operations, ES-26 with associated bagfilter, CD-57.

November 19, 2004 – Administrative amendment to 02151T20, issued as 02151T21, effective date November 19, 2004.

March 4, 2005 – Title V permit Renewal application 1400022.05A received.

March 18, 2005 – Recommendations and comments from ARO on Title V renewal received.

May 25, 2005 – 502(b)(1) amendment to 02151T21, issued as 02151T22, effective date May 25, 2005. Added two lumber drying kilns that were relocated from the closed Conover Facility.

March 20, 2006 – Draft to Permittee for review.

March 21, 2006 – Permittee comments addressed.

March 21, 2006 – Draft permit and review to ARO Patrick Ballard for review/comment.

March 23, 2006 – Draft permit to Title V coordinator for review

March 24, 2006 – Title V coordinator comments resolved.

March 28, 2006 – ARO responds with no comments.

IV. Permit Modification/Changes

The following table describes the modifications to Permit 02151T22 and incorporated into Permit 02151T23.

Old Page	New Page	Section	Description of Change(s)
1	1	~	Updated permit number and dates
All	All		Updated all conditions with most recent conditions for shell.
10	10	2.1 C.1.b	Replaced ID No. ES-26.1 with individual emission sources; ES-26a, 26b, 26c, 26-TD1, 26-WD1, 26-SD2, 26-VW1
10	10	2.1 C.1.c	Added noncompliance statement if records are not kept.
11	11	2.1 C.2.c	Replaced ID No. ES-26.2 with individual emission sources; ES-26d and ES-26e.
11	11	2.1 C.2.d	Added noncompliance statement if records are not kept.
12	12	2.1 C.3.d	Deleted requirement to determine normal; already done.
12	12	2.1 C.3.e	Added noncompliance statement if records are not kept.
13	13	2.1 D.1.b	Changed frequency of inspection from weekly to monthly.
13	13	2.1 D.1.c	Added noncompliance statement if records are not kept.

Old Page	New Page	Section	Description of Change(s)
14	14	2.1 D 2.d-i	Deleted visible emission monitoring, recordkeeping and reporting for consistency with the Virginia Street Complex and the Harper facility permit conditions for similar emission sources. The dry filters are an integral part of the spray booth, and they are inspected.
15	14	2.1 D 3.c	Added noncompliance statement if records are not kept.
15	14	2.1 D 3.d	Changed reporting frequency from quarterly to semi-annually for PSD avoidance.
15	15	2.1 D 4.c	Added noncompliance statement if records are not kept.
15	15	2.1 D 4.d	Changed reporting frequency from quarterly to semi-annually for PSD avoidance.
15	15	2.1 E	Deleted lumber kilns for sources with no applicable requirements. They are subject to MACT Subpart DDDD.
20	20	2.2 C	Added requirement for facility to demonstrate compliance with NC air Toxics by 10/01/2008 (compliance date for MACT Subpart DDDD).
20	20	2.3	Added condition for emission sources subject to MACT Subpart DDDD.
20-28	21-28	3	Updated general conditions
30-32	~	Part II	Deleted Part II

V. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0512, Particulates from Miscellaneous Wood products Finishing Plants
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Sources
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
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance conditions for 2D .0530 (PSD for VOC),

VI. NSPS, NESHAP/MACT, PSD, 112r, CAM

NSPS – N/A

NESHAP/MACT – The wood furniture manufacturing operations are subject to, and is currently complying with the Wood Furniture manufacturing Operations MACT Subpart JJ. The lumber drying kilns, particleboard manufacturing operations, and certain gluing operations [use of urea formaldehyde and polyvinyl acetate glues) are “affected sources” under the Plywood and Composite Wood Products MACT (40 CFR 63 Subpart DDDD), compliance date October 1, 2008. The facility has already submitted their notification for their lumber drying operations under 40 CFR 63 Subpart A and Subparts DDDD.

The Permittee, on January 11, 2005, submitted, pursuant to 40 CFR 63.9(b) the required initial notification of the emissions sources that were potentially subject to the Plywood and Composite Wood Products MACT.

PSD – N/A The facility has two PSD avoidance conditions for VOC emissions.

112r – N/A

CAM – The facility submitted a CAM applicability analysis. The analysis was reviewed and CAM is not applicable to any of the emission sources at the facility.

VII. Facility Wide Air Toxics

A permit condition was added to the permit that requires that the facility submit a facility wide air toxics demonstration as required under 15A NCAC 2Q .0705. This must be done no later than the compliance date for the last applicable MACT (10/01/2008 for MACT Subpart DDDD Plywood and Composite Wood Products).

VIII. Statement of Compliance

The facility was last inspected on August 3, 2005 and was found to be in compliance with all permit requirements.

IX. Facility Emissions Review

There is no change in emissions for this renewal.

X. Stipulation Review

ARO comments have been considered, and ARO agrees with the resolution of the comments.

XI. Public Notice / EPA and Affected State 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 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. Tennessee and Virginia are affected states.

Comments Received on DRAFT Permit – Comments during public notice period were received from ???? as follows:

XII. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.