

## Air Permit Review

Permit Issue Date: **February 6, 2010**

**Region:** Mooresville Regional Office  
**County:** Catawba  
**NC Facility ID:** 1800043  
**Inspector's Name:** Joseph Foutz  
**Date of Last Inspection:** 02/19/2009  
**Compliance Code:** 3 / Compliance – insp.

Facility Data			Permit Applicability
<b>Applicant:</b> Century Furniture Industries, Inc., Plant #3 3086 Main Avenue NW Hickory, NC 28601  <b>SIC:</b> 2511 / Wood Household Furniture <b>NAICS:</b> 337122 / Nonupholstered Wood Household Furniture Mfg.			<b>SIP:</b> 2D .0503, .0512, .0516 and .0521 <b>NSPS:</b> Not Applicable <b>NESHAP:</b> 40 CFR 63, Subpart JJ <b>PSD:</b> Not Applicable <b>PSD Avoid:</b> Not Applicable <b>NC Toxics:</b> Not Applicable <b>112(r):</b> Not Applicable <b>Other:</b> 2D .1806 and 112(j) [i.e. MACT hammer for boilers]
<b>Facility Classification:</b> Before: Title V After: Title V <b>Fee Classification:</b> Before: Title V After: Title V			
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<b>Application Number:</b> 1800043.09A & B <b>Date Received:</b> 11/06/2009 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 03749/T15 <b>Existing Permit Issue Date:</b> 10/26/2005 <b>Existing Permit Expiration Date:</b> 09/30/2010
Kim Wiles Facility Eng. Manager (828) 326-8570 PO Box 608 Hickory, NC 28603	Kevin Boyle Plant Manager (828) 326-8458 3086 Main Ave. NW Hickory, NC 28601	Leslie Herman Compliance Coord. (828) 326-8259 Post Office Box 608 Hickory, NC 28603	
<b>Review Engineer:</b> David Putney  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____			<b>Comments / Recommendations:</b> Issue 03749/T16 <b>Permit Issue Date:</b> <b>February 6, 2010</b> <b>Permit Expiration Date:</b> <b>January 31, 2015</b>

### I Reason for Application:

**Facility Description:** Century Furniture Industries, Inc. manufactures and finishes upholstered wood furniture at the Plant 3 facility in Hickory, NC.

**Requested Permit Modifications:** The Permittee submitted permit application 1800043.09B to renew Permit No. 03749T15. This application also includes the removal of two bagfilters (ID Nos. B1 and B3). The Permittee also submitted application 1800043.09A (subsequently consolidated into application 1800043.09B) as a MACT “hammer” application for the three natural gas-fired boilers at this facility pursuant to 112(j) of the Clean Air Act.

### II Regulatory review for rules that apply to emissions from individual source categories:

#### A. Wood dust collection system (ID No. WC-1) and associated simple cyclone (80 inches in diameter; ID No. CY2) in series with bagfilter (6,924 square feet of filter area; ID No. B-2)

The wood dust collection system collects the wood dust generated by the various pieces of woodworking equipment utilized at this facility.

##### i. 2D .0512 “Particulates from Wood Products Finishing Plants”

This rule applies to the wood dust collection system and requires that the Permittee “shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged ... into the environment without providing ... adequate ductwork and properly designed collectors ...” No excessive VEs were noted during the most recent compliance inspection on 02/19/09. Compliance with this regulation is expected due to the presence of the bagfilter and cyclone installed on the wood dust collection system.

Permit No. 03749T16 will include the standard shell language for the control requirements of 2D .0512 but will not require any testing to demonstrate compliance for this system.

Permit No. 03749T16 will require monthly external (cyclone/ductwork/bagfilter) and annual internal (bagfilter) monitoring (with the associated recordkeeping) and semiannual reporting associated with rule 2D .0512 for the wood dust collection system. Permit No. 03749T16 will also require the Permittee to submit the results of maintenance performed on the bagfilter and/or cyclone within 30 days of a written request by DAQ.

**ii. 2D .0521 “Control of Visible Emissions”**

The wood dust collection system was installed after 07/01/71. Therefore, except for those visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under 2D .0535, paragraph 2D .0521(d) requires that the 6-minute average VEs from this source be less than or equal to 20% opacity with the following exceptions:

- One six-minute average VE per hour may exceed 20% opacity as long as that VE does not also exceed 87% opacity; and
- Up to four six-minute average VEs per 24-hour period may exceed 20% opacity as long as those VEs do not also exceed 87% opacity.

For the wood dust collection system, Permit No. 03749T16 will include the standard language for the emission limits of, and the prescribed methods of testing for compliance (if/when required by DAQ) with, 2D .0521. Further, Permit No. 03749T16 will require monthly VE monitoring and recordkeeping for each of these sources and semiannual summary reporting to DAQ.

**B. Wood furniture finishing operations (ID No. ES-F1), including:**

**Twenty eight dry filter-type spray booths (ID Nos. SB-1 through SB-28);**

**One waterwash-type spray booth (ID No. SB-29);**

**Two wash-off tanks (ID Nos. WO-1 and WO-2);**

**One rack cleaning vat (ID No. RCV-1); and**

**One gluing operation (ID No. ES-G1)**

The Permittee utilizes these sources to perform gluing operations to assemble wooden upholstery furniture and subsequently apply various finishes to the furniture.

**i. 2D .0512 “Particulates from Wood Products Finishing Plants”**

This rule applies to the wood furniture finishing operations and requires that the Permittee “shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged ... into the environment without providing ... adequate ductwork and properly designed collectors ...” No excessive VEs were noted during the most recent compliance inspection on 02/19/09. Compliance with this regulation is expected due to the presence of the dry filters and waterwash installed on the spray booths. DAQ does not consider the wash-off tanks, the rack cleaning vat, and/or the gluing operations to be significant sources of particulate matter emissions.

Permit No. 03749T16 will include the standard shell language for the control requirements of 2D .0512 but will not require any testing to demonstrate compliance for this source.

Permit No. 03749T16 will require weekly external (dry filters/waterwash/ductwork) and annual internal (ductwork) monitoring (with the associated recordkeeping) and semiannual reporting associated with rule 2D .0512 for the wood furniture finishing operations. Permit

No. 03749T16 will also require the Permittee to submit the results of maintenance performed on the filters and/or ductwork within 30 days of a written request by DAQ.

**ii. 2D .0521 “Control of Visible Emissions”**

DAQ does not consider the wash-off tanks, the rack cleaning vat, and/or the gluing operations to be significant sources of particulate matter emissions [and therefore visible emissions (VEs)]. Therefore, only the 29 spray booths are subject to this rule. Spray booths SB-16 through SB-29 were manufactured after 07/01/71. Spray booths SB-1 through SB-15 were manufactured before 07/01/71. Therefore, except for those visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under 2D .0535, paragraph 2D .0521(d) requires that the 6-minute average VEs from spray booths SB-1 through SB-15 and SB-16 through SB-29 be less than or equal to 40% and 20% opacity, respectively, with the following exceptions:

- One six-minute average VE per hour may exceed 40% or 20% opacity, as applicable, as long as that VE does not also exceed 87% or 90% opacity, respectively; and
- Up to four six-minute average VEs per 24-hour period may exceed 40% or 20% opacity, as applicable, as long as those VEs do not also exceed 87% opacity or 90% opacity, respectively.

For the spray booths, Permit No. 03749T16 will include the standard language for the emission limits of, and the prescribed methods of testing for compliance (if/when required by DAQ) with, 2D .0521. Further, Permit No. 03749T16 will require monthly VE monitoring and recordkeeping for these sources and semiannual summary reporting to DAQ.

**C. Three natural gas-fired boilers (16.7, 8.4, and 2.2 million Btu per hour maximum heat input rates; ID Nos. BNG-1, BNG-2, and BNG-3, respectively)**

Boilers BNG-1, BNG-2, and BNG-3 were installed in 1978, 1970, and 1975, respectively, and are used to generate process heat and steam for use throughout the facility.

**i. 2D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”**

This rule applies to boilers BNG-1, BNG-2, and BNG-3 and limits the allowable PM emissions (E) from these sources to those described in the following equations:

$$E = \begin{cases} 0.10 & \text{If } Q \geq 10,000, \\ 0.60 & \text{If } Q \leq 10, \text{ and} \\ 1.090(Q)^{-0.2594} & \text{If } Q \text{ is any other value} \end{cases}$$

Where: E = allowable emissions (lb PM/10<sup>6</sup> Btu), and  
Q = maximum heat input (10<sup>6</sup> Btu/hr)

All three boilers were installed before 02/01/83, therefore, for the purposes of this rule Q = 27.3 (10<sup>6</sup> Btu/hr) [i.e. 16.7 + 8.4 + 2.2]. Note that current Permit No. 01819T15 incorrectly includes the heat inputs of the air make-up units, resulting in an incorrect allowable PM emission limit of 0.44 (lb PM/10<sup>6</sup> Btu). This is corrected in Permit No. 01819T16.

$$Q = 27.3 (10^6 \text{ Btu/hr}) \text{ and} \\ E = 0.46 (lb \text{ PM}/10^6 \text{ Btu})$$

Table 1.4-2 of Supplement D to the 5<sup>th</sup> edition of the AP-42 document predicts total PM emissions of 7.6 (lb/10<sup>6</sup> ft<sup>3</sup>) from natural gas combustion. If we assume a natural gas heat value of 1,020 (Btu/ft<sup>3</sup>) then we can estimate PM emissions from natural gas combustion as:

$$\left[ \frac{7.6 (lb \text{ PM})}{10^6 (ft^3)} \right] \left[ \frac{ft^3}{1,020 (Btu)} \right] = 0.0075 \left( \frac{lb \text{ PM}}{10^6 \text{ Btu}} \right)$$

For these boilers, Permit No. 03749T16 will include the standard language for the emission limits of 2D .0503 and the methods of testing for compliance (if/when required by DAQ) but will not (since the permitted fuel is inherently compliant with this rule) require any additional testing or any MRR to demonstrate compliance with 2D .0503.

**ii. 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”**

This rule applies to boilers BNG-1, BNG-2, and BNG-3 and limits the SO<sub>2</sub> emissions from these combustion sources to 2.3 (lb/10<sup>6</sup> Btu).

Table 1.4-2 of Supplement D to the 5<sup>th</sup> edition of the AP-42 document predicts SO<sub>2</sub> emissions of 0.6 (lb SO<sub>2</sub>/10<sup>6</sup> ft<sup>3</sup>) from the combustion of natural gas. Assuming a natural gas heat value of 1,020 (Btu/ft<sup>3</sup>) we can estimate SO<sub>2</sub> emissions while burning natural gas as:

$$\left[ \frac{0.6 \text{ (lb SO}_2\text{)}}{10^6 \text{ (ft}^3\text{)}} \right] \left[ \frac{\text{ft}^3}{1,020 \text{ (Btu)}} \right] = 0.00059 \left( \frac{\text{lb SO}_2}{10^6 \text{ Btu}} \right)$$

For these boilers, Permit No. 03749T16 will include the standard language for the emission limits of 2D .0516 and the methods of testing for compliance (if/when required by DAQ) but will not (since the permitted fuel is inherently compliant with this rule) require any additional testing or any MRR to demonstrate compliance with 2D .0516.

**iii. 2D .0521 “Control of Visible Emissions”**

Boilers BNG-1 and BNG-3 were manufactured after 07/01/71 whereas BNG-2 was manufactured before 07/01/71. Therefore, except for those visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under rule 2D .0535, paragraph 2D .0521(d) requires that the 6-minute average VEs from these boilers be less than or equal to 20% opacity (BNG-1/BNG-3) or 40% opacity (BNG-2) with the following exceptions:

- One six-minute average VE per hour may exceed 20% opacity (BNG-1/BNG-3) or 40% opacity (BNG-2) as long as that VE does not also exceed 87% opacity (BNG-1/BNG-3) or 90% opacity (BNG-2); and
- Up to four six-minute average VEs per 24-hour period may exceed 20% opacity (BNG-1/BNG-3) or 40% opacity (BNG-2) as long as those VEs do not also exceed 87% opacity (BNG-1/BNG-3) or 90% opacity (BNG-2).

For these boilers, Permit No. 03749T16 will include the standard language for the emission limits of 2D .0521 and the methods of testing for compliance (if/when required by DAQ) but will not (since noncompliance is considered unlikely and since this source has a documented history of compliance with this rule) require any additional testing or any MRR to demonstrate compliance with 2D .0521.

**iv. 15A NCAC 2D .1109 “112(j) Case-by-Case Maximum Achievable Control Technology” Clean Air Act Section 112(j) - Case-by-Case MACT for Boilers & Process Heaters**

On 07/20/07, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a valid standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On 09/08/09, the NC DAQ received a Part 2 MACT “Hammer” application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ’s recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for natural gas-fired boilers in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA’s AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources of this size (i.e. 16.7, 8.4, and 2.2 million Btu per hour), consistent with the provisions in CAA §112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boilers as follows:

Annual boiler inspections and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- Inspect the burner, and clean or replace any components of the burner as necessary;
- Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,
- Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.

The Permittee shall conduct at least one tune-up per calendar year on each boiler to demonstrate compliance with this requirement.

In addition, the Permittee will be required to record the results of the annual inspections in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

### **III Regulatory review for rules that apply to aggregate emissions from multiple sources:**

#### **A. Wood furniture finishing operations, including:**

**Twenty eight dry filter-type spray booths (ID Nos. SB-1 through SB-28);**

**One waterwash-type spray booth (ID No. SB-29);**

**Two wash-off tanks (ID Nos. WO-1 and WO-2);**

**One rack cleaning vat (ID No. RCV-1); and**

**One gluing operation (ID No. ES-G1)**

#### **i. 2D .1111 “Maximum Achievable Control Technology” [40 CFR Part 63, Subpart JJ]**

The wood furniture finishing operation sources are subject to this rule due to the applicability of 40 CFR Part 63, Subpart JJ (i.e. the NESHAP for Wood Furniture Manufacturing Operations). Current Permit No. 03749T15 includes detailed MACT language associated with Subpart JJ. Application 1800043.09B indicates that the Permittee has not made any changes since the issuance of Permit No. 03749T15 that would affect the applicable requirements pursuant to Subpart JJ. Therefore, the relevant language from Permit No. 03749T15 is “carried over” into Permit No. 03749T16 unchanged.

#### **B. Facility-wide affected sources**

#### **i. 2D .1806 “Control and Prohibition of Odorous Emissions”**

This rule requires the Permittee to prevent odorous emissions from the facility from causing or contributing to objectionable odors [as defined at 2D .1801(9)] beyond the facility’s boundary. The Permittee conducts operations that would reasonably be expected to create

objectionable odors but does not have a history of violations of this rule. Therefore, this rule is added to Permit No. 03749T16, but with only the standard shell language.

**IV NSPS/NESHAP/PSD/Toxics/112(r)/CAM/RACT Applicability:**

**NSPS:** No New Source Performance Standards (NSPS - pursuant to 2D .0524 and 40 CFR Part 60) apply to sources at this facility. Note that boilers BNG-1, BNG-2, and BNG-3 pre-date NSPS Subpart Dc and boilers BNG-2 and BNG-3 have maximum heat input capacities below the associated 10 million Btu per hour applicability threshold (see Section II C, above).

**NESHAP:** The wood furniture finishing operations at this facility are subject to National Emission Standards for Hazardous Air Pollutants pursuant to rule 2D .1111 and 40 CFR Part 63, Subpart JJ (i.e. the NESHAP for wood furniture manufacturing operations – see the discussion in Section III A.i of this document, above). Also, the boilers at this facility are subject to a Maximum Achievable Control Technology standard under 2D .1109 pursuant to Section 112(j) of the Clean Air Act (i.e. the MACT “hammer” – see discussion in Section II C.iv of this document, above).

**PSD:** This facility does not fall into one of the PSD categories listed at 40 CFR §51.166(b)(1)(i)(a) with a 100 ton per year threshold and does not have the potential to emit > 250 tons of any regulated pollutant per consecutive 12-month period before limits. Therefore, this facility is classified as minor for PSD purposes. Application 1800043.09B is a renewal without an emissions increase and does not represent a major modification for PSD purposes – therefore a PSD review is not triggered.

**Toxics:** The Permittee is not subject to the NC toxics program: the wood dust collection system (ID No. WC-1) is not a source of TAP; the wood furniture finishing operation (ID No. ES-F1) is exempt from toxics demonstrations pursuant to 2Q .0702(a)(23); and the boiler (ID No. BNG-1) is exempt from toxics demonstrations pursuant to 2Q .0702(a)(18).

**112(r):** According to Section A3 of application 1800043.09B, this facility does not store any substances regulated under 112(r) in quantities above the associated thresholds and is therefore not subject to the requirements of Section 2D .2100 “Risk Management Program” or 40 CFR Part 68 “Chemical Accident Prevention Provisions” other than General Duty.

**CAM:** No sources at this facility are subject to the requirements of 40 CFR Part 64 “Compliance Assurance Monitoring” pursuant to 2D .0614 “Compliance Assurance Monitoring” [refer to the CAM applicability table (Attachment A to this document) for more information].

**RACT:** This facility is not located in one of the areas listed in 2D .0902(e) or 2D .1402(d) and is therefore not subject to the existing source RACT requirements.

**V Permit Modifications/Changes:**

The following table summarizes the changes in Permit No. 03749T16 resulting from Permit Application No. 1800043.09B:

Old Page(s)	New Page(s)	Condition/Item	Description of Change(s)
Global	Global	N/A	<ul style="list-style-type: none"> <li>• Update format to current shell version (e.g. remove Part II of the permit, and change the testing rule reference to 2D .2601);</li> <li>• Change the issuance/effective dates of the permit</li> <li>• Change the application number and complete date;</li> <li>• Remove references to the boiler MACT (i.e. Subpart DDDDD) since it has been vacated;</li> <li>• Change permit revision number to T16; and</li> <li>• Specify that failure to maintain records is deemed noncompliance with the associated rule</li> </ul>

Old Page(s)	New Page(s)	Condition/Item	Description of Change(s)
Global	Global	N/A	<ul style="list-style-type: none"> <li>Allow for delivery of reports “by hand” in addition to delivery via mail; and</li> <li>Modify source and control device descriptions to include capacities, filter area and cyclone diameter</li> </ul>
3	3	Equipment List	<ul style="list-style-type: none"> <li>Add BNG-2 and BNG-3 to the equipment list and add “112(j)” designation to all three boilers; and</li> <li>Remove bagfilters B-1 and B-3</li> </ul>
4 – 5	4 - 5	2.1 A	Modify this section to remove bagfilters B-1 and B-3
4	4	2.1 A.1.b.ii	Specify that the annual inspection shall be for each 12 month period following the initial inspection
5	5	2.1 A.2.c	Update the monitoring associated with 2D .0521 and: <ul style="list-style-type: none"> <li>Specify monitoring for each week of calendar year;</li> <li>Add “(Method 9) for 12 minutes”; and</li> <li>Remove the requirement to establish “normal”</li> </ul>
6	6	2.1 B.1.b.ii	Specify that the annual inspection shall be for each 12 month period following the initial inspection
7	7	2.1 B.2.d	Update the monitoring associated with 2D .0521 and: <ul style="list-style-type: none"> <li>Specify monitoring for each month of calendar year;</li> <li>Add “(Method 9) for 12 minutes”; and</li> <li>Remove the requirement to establish “normal”</li> </ul>
8	8 - 9	2.1 C 2.1 C.1.a 2.1 C.4	Modify section to include all three boilers, correct the 2D .0503 PM allowable emission limit, and add the 112(j) MACT “hammer” requirements
11 - 12	12	2.2 B.1	Remove language addressing the vacated boiler MACT (i.e. 40 CFR Part 63, Subpart DDDDD) and add the requirements of 2D .1806
12 - 20	13 - 21	Section 3	Update general conditions to version 3.0

Note: Condition/Item numbers are as they appear in Permit No. 03749T16.

## VI Title V Permit History:

The following table provides a very brief summary of Title V permit revisions for this facility:

Permit No.	Issuance Date	Description of Revision
03479T13	12/13/99	Issue initial Title V permit (no modifications – effective 01/13/00)
03840T14	12/04/00	Add wash-off tank WO-3 to Plant 7
03840T15	10/26/05	Renewal of Title V permit and removal of Plant 7 from the permit
03840T16	02/06/10	Renewal of Title V permit, removal of bagfilters B-1 and B-3, and application of 112(j) (i.e. boiler MACT “hammer”) to the boilers

## VII Application Fee/Zoning Consistency:

No fee or zoning consistency determination is required for the air quality permit renewal requested via application 1800043.09B or the 112(j) MACT “hammer” application (i.e. 1800043.09A, which has been consolidated into this application).

## VIII Compliance Status:

The facility was most recently inspected on 02/19/09 by Joe Foutz of MRO and appeared to be operating in compliance with DAQ requirements during that inspection.

## IX Miscellaneous:

**Equipment List:** Two bagfilters (ID Nos. B-1 and B-3) have been removed from the equipment list of Permit No. 03749T16 as requested in Section A2 of application 1800043.09B. Also, two boilers included in the list of insignificant activities attached to Permit No. 03749T15 as I-BNG-2 and I-BNG-3 are now included in the equipment list of Permit No. 03749T16 as BNG-2 and BNG-3 as a result of application of the MACT “hammer” to these sources (see Section II C.iv, above).

**Insignificant Activities List:** The description of one source included in the list of insignificant activities attached to Permit No. 03749T15 has been modified at the request of the Permittee. Specifically, the description of existing source I-BA-1 is changed from a natural gas-fired boiler with 3.0 million Btu per hour maximum heat input to a natural gas-fired air makeup unit with 3.3 million Btu per hour maximum heat input as requested in Section A2 of application 1800043.09B. Also, as noted in the preceding paragraph, two boilers (BNG-2 and BNG-3) have been moved from the insignificant activities list to the equipment list.

**Signature by Responsible Official:** Mr. Kevin Boyle (i.e. the responsible official for the Century Furniture Industries, Inc. – Plant 3 facility) provided the required signatures on Form E5 of permit application 1800043.09B and in Section 3 of application 1800043.09A.

## X Permit Review:

**Draft Permit:** A draft version of Permit No. 03749T16 and the associated review were sent to the Permittee and the MRO for a review and comment period on 12/11/09.

**Public Participation:** In accordance with 2Q .0521, NC DAQ must provide the opportunity for public participation prior to the renewal of a Title V permit (such as that represented by application 1800043.09B). NC DAQ met this obligation with the public notice posted in “a newspaper of general circulation in the area where the facility is located” and “mailed to persons who are on the Division’s mailing list for air quality permit notices” on 12/29/09.

**EPA & Affected States Review:** In accordance with 2Q .0522, NC DAQ must provide EPA and any Affected States [as defined at 2Q .0503(1)] the opportunity to review a proposed renewal of this Title V permit. NC DAQ met this obligation by sending those agencies a copy of Proposed Permit No. 03749T16 and the associated review on 12/29/09.

## XI Recommendation:

The Title V Permit renewal application for the Century Furniture Industries, Inc. – Plant 3 facility in Hickory, Catawba County, North Carolina has been reviewed by NC DAQ personnel to determine compliance with all applicable procedures and requirements. NC DAQ personnel have determined that this facility is complying or will achieve compliance with all applicable requirements as specified in Permit No. 03749T16.

Issuance of Permit No. 03749T16 is recommended.

**Attachment A: CAM Applicability Summary Table**

<b>Emission Source(s)</b>	<b>Control Device(s)</b>	<b>Controlled TV Pollutant(s)</b>	<b>Pre-Control PTE of Controlled TV Pollutant(s) (tons per year)</b>	<b>CAM Disqualification(s)/Exemption(s)</b>	<b>CAM Applicable?</b>
Wood dust collection system (ID No. WC-1)	Bagfilter B-2 and Cyclone CY2	PM <sub>10</sub>	< 100	Does not meet criteria of 15A NCAC 2D .0614(a) [Emission less than major source thresholds]	No
Natural gas-fired boilers (ID Nos. BNG-1, -2, and -3)	N/A	N/A	N/A	Do not meet criteria of 15A NCAC 2D .0614(a) [No control device]	No
Wood dust collection system (ID No. WC-1)	N/A	N/A	N/A	Does not meet criteria of 15A NCAC 2D .0614(a) [No control device]	No

Proposed