

Air Permit Review

Permit Issue Date: July XX, 2008

Region: Mooresville Regional Office
County: Lincoln
NC Facility ID: 5500009
Inspector's Name: Denise Hayes
Date of Last Inspection: 12/18/2007
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)		
<p>Applicant (Facility's Name): Cochrane Furniture Divisions 10 20 35 and 55</p> <p>Facility Address: Cochrane Furniture Divisions 10, 20, 35 and 55 190 Cochrane Road Lincolnton, NC 28092</p> <p>SIC: 2511 / Wood Household Furniture NAICS: 337122 / Non-upholstered Wood Household Furniture Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: 2D .0951 NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: General Condition MM</p>		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 5500009.08A Date Received: 03/24/2008 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 03774/T16 Existing Permit Issue Date: 12/09/2005 Existing Permit Expiration Date: 09/30/2010</p>		
Glenn Helms Maintenance 704-732-1151 PO Box 220 Lincolnton, NC 28093	Jim Kimbrough Plant Manager 704-732-1151 PO Box 220 Lincolnton, NC 28093	Glenn Helms Maintenance 704-732-1151 PO Box 220 Lincolnton, NC 28093			
<p>Review Engineer: Charles Yirka</p> <p>Review Engineer's Signature: _____ Date: July XX, 2008</p>			<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03774/T17 Permit Issue Date: July XX, 2008 Permit Expiration Date: September 30, 2010</p>		

1. Introduction

Cochrane Furniture was permitted to manufacture wooden furniture at this Lincoln County site. The facility is subject to a MACT 2D .1111 Subpart JJ (Furniture Manufacturing Operations). Cochrane is currently operating under Title V permit No. 03774T16.

Cochrane is located in the Metrolina Nonattainment area and is considered a VOC major source with a PTE of greater than 100 tons per year as such RACT applicability must be addressed.

2. Statement of Compliance

Based on the latest inspection on December 18, 2007 the facility appeared to be operating in compliance with all applicable air quality standards and regulations.

The five-year compliance history is detailed in the inspection report.

3. Purpose of Application

MACT/State Toxic Air Pollutants Program

The only MACT that applies is MACT JJ. Cochrane apparently underwent a state air toxics review and the pollutants cadmium and manganese were found to be under the TPER.

RACT

Cochrane is located in the Metrolina Nonattainment area and appeared to be an existing VOC major source with a PTE of greater than 100 tons per year. As such, the Director notified Cochrane that RACT may apply. Cochrane submitted additional information that indicated they were considering becoming a true minor or synthetic minor source. Since the permit contains multiple conditions for 2Q .0317 for 2D .0530 avoidance, DAQ responded that by definition they appeared to be a major source of VOC as the facility's PTE was greater than 250 tons per year since. Trigon Engineering (Mike Sussman) indicated that the miscellaneous VOC RACT 2D .0951 would apply and followed with a permit application. Trigon therein proposed that specifically RACT rule 2D .0951(c)(1) would apply and indicated that the MACT Subpart JJ meets the requirements of the RACT. The DAQ concurs with this finding as this allows permitting authorities to streamline their RACT reviews when a particular MACT (e.g., Subpart JJ) is effective at controlling VOCs¹. EPA has indicated MACT controls are usually considered superior to RACT. The MACT JJ (which requires compliant coatings with 1.0 lb VHAP/lb solids or less and emission averaging with compliant coatings not to exceed 1.0 lb VHAP/lb solids, and work practices). All remaining sources of VOC (not subject to Subpart JJ) required evaluating as well. The remaining sources subject to a RACT review included two 13.3 mmBtu/hr wood-fired boilers and a 6.0 mmBtu/hr natural gas-fired boiler. Trigon used DAQ combustion spreadsheet to confirm that the boilers are "exempt" under 2D .0902. The permit will be processed as a significant modification pursuant to 15A NCAC 2Q .0501(d) and therefore will be subject to a concurrent 30 day public notice and 45 day EPA review.

Finally, Cochrane's NOx PTE was confirmed by this engineer; the PTE is about 68 tons per year from all combustion sources therefore a NOx RACT review is not required.

Removal of Permit Section Part II

The permit had a Part II authorizing the construction of a bagfilter on a wood dust collection system. The notification requirements for a 502(B)(10) change have been met according to Cochrane therefore the Part II and associated footnotes in Part I were removed.

Other

The 2D .0521 permit language was updated. The permit shield for non-applicable requirements and General Condition MM was added to the permit. The NAA Added Fee did not appear to apply

4. Application Chronology

June 29, 2007	Date of Notification Letter from Director regarding RACT (re: Applicability Determination #1020)
July 10, 2007	Letter from Shana Spaur ES Manager regarding ongoing evaluation to see if small or synthetic minor thereby avoiding RACT (re: Applicability Determination #1020)
December 13, 2007	Response granting extension from RCO noting facility appeared to be a major source for VOC (close-out of Applicability Determination #1020/permit application required).
December 18, 2007	Date of last Inspection
February 14, 2008	Email from Trigon (Mike Sussman) proposing applying RACT for miscellaneous coatings 2D .0951(c)(2)
March 17, 2008	Date of application from Trigon received by RCO and assigned to review engineer
March 19, 2008	Email to Trigon for an alternate proposal
May 1, 2008	Draft to Title V Supervisor
May 13, 2008	Draft to MRO and applicant
May 19, 2008	Comments received from applicant via email

¹ See *Federal Register*/Vol .70, No. 288/Tuesday, November 29, 2005/Rules and Regulations/71653-71655

5. A. New Regulatory Requirements - RACT

The facility was found to be subject to RACT because potential VOC emissions were more than 100 tons per year in an area designated as a moderate non-attainment area for ozone. The facility is however subject to MACT JJ. The EPA has indicated that MACT is generally superior to RACT. This MACT for furniture finishing operations and was determined to be effective, in addition to controlling VHAP, at controlling VOC emissions. The facility is subject to the following RACT regulation:

15A NCAC 02D .0951 MISCELLANEOUS VOLATILE ORGANIC COMPOUND EMISSIONS

- a. This Rule applies to all facilities that use volatile organic compounds as solvents, carriers, material processing media, or industrial chemical reactants, or in other similar uses, or that mix, blend, or manufacture volatile organic compounds for which there is no other applicable 2D .0900 rule.
- b. The Permittee has "installed and operates reasonable available control technology" as the MACT Subpart JJ meets the requirements of RACT* [15A NCAC 2D .0951(c)(1)].
 - i. Final compliance was demonstrated for existing source RACT no later than **April 1, 2009** [15A NCAC 2D .1403(c)(2)(F)]

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required.

* See *Federal Register*/Vol .70, No. 288/Tuesday, November 29, 2005/Rules and Regulations/71653-71655

B. New Regulatory Requirements - Sources Exempt from RACT

The RACT review indicated some VOC emitting sources are not subject to RACT and "exempt" as per 2D .0902(d). The DAQ found the following permit shield language would be an appropriate way to address these sources:

2.3 - Permit Shield for Non-applicable Requirements

The Permittee is shielded from the 2D .0900 rules for the following sources:

1. The boilers shall not be subject as emissions are less than 15 pounds per day each as per 2D .0902(d).

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

There are no NSPS affected sources.

Cochrane is a major HAP source subject to MACT Subpart JJ.

With regard to NAA/NSR, Cochrane has taken multiple limits on VOC emissions of 250 tpy to avoid PSD. As such they are classified as a major source. The major source threshold is now 100 tpy in all counties in Metrolina. Actual VOC emissions would indicate Cochrane could be a synthetic minor source but has not chosen to take limits and exercise this option at this time. This modification will not affect PSD status.

Lincoln County is not in attainment with the 8-hour ozone standard. The area was designated as Nonattainment on June 15, 2004. The attainment date is June 2010. Cochrane is subject to RACT however the NAA Added Fee does not apply at this time. (The facility is not required to "change the method of operation e.g., install additional controls or work practices to comply with RACT" as per February 29, 2008 memorandum).

According to the application, this facility does not use, make, or store any of the regulated substances in quantities above the 112(r) threshold.

7. Changes to Existing Permit

The following table summarizes changes made to the existing permit.

Old Page #	New Page #	Section	Description of Change
N/A		N/A	Update cover letter, remove references to Part II, renewal application due date
4	4	1	Remove footnote for 502(b)10 change for the control device CD-10-BF7
8	7	2.1 A.2.d.	Update .0521 monitoring
11	11	2.1 B.2.d	Update .0521 monitoring
12	11	2.1 C.	Insert table reference to 2D .0951
13	12	2.1 C.2.d.	Update .0521 monitoring
NA	20-21	2.2. B	Add RACT rule 2D .0951 where MACT is sufficient to meet RACT
NA	21	2.3	Add Permit Shield for VOC sources exempt 2D .0900
22	22	3	Update General Conditions (version 2.20)
NA	29	3	Add General Condition MM for fugitive emissions
31	NA	Part II Section 1	Remove PART II and general conditions

8. Application Fee, PE Seal, Zoning Consistency, Responsible Official

An application fee is not required with a RACT permit application.

As this modification does not involve the appropriateness and design of control equipment, a PE seal is not required

This is an existing facility. As this modification does not involve expansion of the facility or an increase in emissions, a zoning consistency determination is not required.

Mr. Jim Kimbrough, Plant Manager, signed the application as the responsible official on March 20, 2008. Mr. Glenn Hale is considered to be the new technical contact IBEAM records were updated as Mr. Kimbrough is now considered to be the responsible official and Mr. Hale the new technical contact.

9. Comments and Recommendations

All comments and recommendations from the applicant, the MRO, and Title V Supervisors have been addressed. The 30-day public notice period was over on July XX, 2008 and 45-day EPA review was over on July XX, 2008. This permits section recommends issuance of this permit revision. The MRO concurs with issuance of this permit revision.