

Air Permit Review

Permit Issue Date: **date, 2009**

Region: Asheville Regional Office
County: McDowell
NC Facility ID: 5600036
Inspector's Name: Brendan Davey
Date of Last Inspection: 03/31/2009
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Ethan Allen Operations, Inc. - Pine Valley Division</p> <p>Facility Address: Ethan Allen Operations, Inc. - Pine Valley Division 912 East Main Street Old Fort, NC 28762</p> <p>SIC: 2511 / Wood Household Furniture NAICS: 337122 / Nonupholstered 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:</p> <p>NSPS:</p> <p>NESHAP:</p> <p>PSD:</p> <p>PSD Avoidance:</p> <p>NC Toxics:</p> <p>112(r):</p> <p>Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 5600036.09A Date Received: 07/29/2009 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 03913/T21 Existing Permit Issue Date: 12/01/2005 Existing Permit Expiration Date: 04/30/2010</p>
<p>Michael Baker Environmental Manager (828) 668-7686 P O Box 639 Old Fort, NC 28762</p>	<p>Ron Hartwell Plant Manager (828) 668-7686 P. O. Box 639 Old Fort, NC 28762</p>	<p>Michael Baker Environmental Manager (828) 668-7686 P O Box 639 Old Fort, NC 28762</p>	
<p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature:</p> <p>Date: date, 2009</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03913/T22 Permit Issue Date: date, 2009 Permit Expiration Date: date, 2014</p>	

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 (**03913T21**) was issued on **December 1, 2005**, and is currently scheduled to expire on **April 30, 2010**. The renewal application was received on **July 29, 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 operates a wooden furniture manufacturing facility. Woodworking operations include lumber drying, sawing, machining, and sanding. Fabricated furniture is finished in a multi-step process with a variety of stains, sealers, and lacquers.

III. History/Background/Application Chronology

July 29, 2009 – Permit Application **5600036.09A** was received and deemed complete for processing.

August 3, 2009 – Asheville Regional Office application review received via email.

August 25, 2009 – DRAFT permit and review sent the Permittee and ARO for comment prior to public notice and EPA review.

date, 2009 – DRAFT permit sent to public notice and EPA for review prior to issuance.

IV. Permit Modifications/Changes and ESM Discussion

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

Page	Section	Description
Attachment	Insignificant activities	-put table into current format -amended permit revision number
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3-4	Equipment table	-modified equipment descriptions as necessary to match ESM descriptions
4	2.1 A 2.1 A.1.c	-added control device ID numbers as needed -corrected allowable emission limit equation to match the correct equation listed in the table for this Section
5	2.1 A.1.d 2.1 A.2.b	-corrected testing rule citation -added particulate matter testing date per Regional Office request -corrected testing rule citation
6	2.1 A.3.b 2.1 A.3.c	-corrected testing rule citation and added visible emissions testing date per Regional Office request -updated shell language
7	2.1 B.1.b 2.1 B.2.b 2.1 B.3.b	-corrected testing rule citation -corrected testing rule citation -corrected testing rule citation
9	2.1 C.2.b 2.1 C.2.c	-corrected testing rule citation -updated shell language
10	2.1 D.1.b	-updated shell language
11	2.1 D.2.b 2.1 D.2.c	-corrected testing rule citation -updated shell language
16-25	General Conditions	-updated shell conditions (v2.22.1)

The equipment tables (both permitted and insignificant) were verified against ESM listings. No changes to the permit or to ESM were necessary for this permit renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0504, Particulates from Wood Burning Indirect Heat Exchangers
15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing
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 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .1111, Maximum Achievable Control Technology)

A regulatory review for the existing sources will not be included in this document. No new requirements are necessary as part of this permit renewal.

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

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

NESHAPS/MACT – The facility is currently required to comply with 40 CFR 63, Subpart JJ “Wood Furniture MACT”. Applicable equipment includes spray booths, wash-off tanks, gluing operations, printers, and steam heated drying ovens. Per regional review, the facility is in compliance with the MACT and continued compliance is expected.

The facility is also currently complying with 15A NCAC 2Q .0317, Avoidance Conditions, for any future maximum achievable control technology standards that may apply to the facility. The Permittee is required to monitor individual and facility-wide total HAP emissions and report those amounts. Continued compliance is expected. With this condition in place, the facility is now defined as a Title III minor source (i.e., area source for MACT). Therefore, the facility has to be analyzed for potential applicability to one of the newly promulgated area source GACTs under 40 CFR Part 63. As of this renewal, no promulgated GACTs apply. Future consideration should be given to any GACT written for combustion sources.

PSD – The facility is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not change 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.

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 the current equipment/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-B1	One wood fuel/solid finishing waste-fired boiler (55 million Btu per hour maximum heat input capacity; pneumatic stoker type without flyash reinjection)	CD-B1.1	One multicyclone (56 nine-inch diameter tubes) flyash collector
		CD-B1.2	One sidestream multicyclone (4 nine-inch diameter tubes)
ES-WW1	Woodworking operations	CD-BF-1 through CD-BF-8	Eight reverse flow type bagfilters (1,155, 3,060, 3,060, 3,060, 2,680, 4,614, 3,060, and 948 square feet of filter area, respectively)

The Permittee underwent a CAM demonstration as part of its previous title V renewal process (**03193T19/May 9, 2005**). During that review process it was determined that CAM was not applicable to this facility. This permit renewal does not change this status.

VII. Facility Wide Air Toxics

The facility is not subject to the toxics regulations. This permit renewal does not change this status.

VIII. Facility Emissions Review

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

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	30.75	40.91
NO _x	25.17	33.49
PM ₁₀	14.30	17.91
SO ₂	1.38	1.84
VOC	213.59	175.65
Total HAP/TAP	14.85	8.07

IX. Stipulation Review

Brendan Davey last completed a compliance inspection of this facility on **February 10, 2009** and a subsequent visible emissions evaluation on **March 31, 2009**. Based on his observations, the facility appeared to be in compliance with the applicable air quality regulations.

As noted above, a visible emissions evaluation was conducted on **March 31, 2009**. Brendan Davey notes "a visible emissions evaluation was conducted and a Notice of Violation/NRE was issued **April 8, 2009** to the company for 15A NCAC 2D .0521 and Air Permit **03913T21** for excessive visible emissions from the wood-fired boiler (**ID No. ES-B1**). A civil penalty has not been assessed yet. The facility is currently considered in compliance with the applicable air quality requirements."

He did point out that although the facility is allowed to combust solid finishing waste in its wood-fired boiler (**ID No. ES-B1**), the facility has stopped that practice since the early 1990's. Therefore, the boiler has been operating as a wood-fired boiler exclusively. He also indicated that the ARO requests that this boiler be tested for both particulate and visible emissions once in the next permit cycle approximately one year from permit expiration. The renewed permit includes this requirement.

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. There are no affected States or local programs.

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.

ARO recommends issuance of the permit and was sent a draft permit prior to issuance (see History Section of this Document above).

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