

Air Permit Review

Permit Issue Date: **November 30, 2007**

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400041
Inspector's Name: Mike Parkin
Date of Last Inspection: 11/01/2006
Compliance Code: 4/In Compliance – Cert.

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Fairfield Chair Company - Plant No. 2 606 Kincaid Circle SW Lenoir, NC 28645			SIP: No Changes NSPS: Not Applicable NESHAP: Not Applicable PSD: Not Applicable PSD Avoidance: Not Applicable NC Toxics: Not Applicable 112(r): Not Applicable Other: Replace rule 2Q .0803 with 2Q .0317 to avoid 2D .1111		
SIC: 2512 / Upholstered Household Furniture NAICS: 337121 / Upholstered Household Furniture Manufacturing					
Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V					
Contact Data					
Facility Contact		Authorized Contact		Technical Contact	
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Review Engineer: David Putney Review Engineer's Signature: _____ Date: _____			Application Data Application Number: 1400041.05A Date Received: 03/31/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02646/T11 Existing Permit Issue Date: 12/05/2001 Existing Permit Expiration Date: 12/31/2005		
			Comments / Recommendations: Issue 02646/T12 Permit Issue Date: November 30, 2007 Permit Expiration Date: October 31, 2012		

I Facility Description:

Fairfield Chair Company operates a wooden furniture (chairs) manufacturing facility in Plant No. 2 located in Lenoir. This Plant No. 2 facility receives assembled frames from the nearby Fairfield Chair Company Plant No. 1 facility and from import sources. Upon arrival at Plant No. 2 these frames are sanded and finished. Some frames are also sprung up and upholstered. The finished chairs are then packed and shipped. Woodworking operations conducted at this Plant No. 2 facility include lumber drying, grinding (hogging) of scrap wood from outside sources for use as fuel in onsite boilers, and minor hand sanding.

II Reason for Application:

The Permittee submitted application 1400041.05A to renew the current Title V permit issued to this facility (Permit No. 02646T11).

III Insignificant Activities List:

The only insignificant activity listed on the attachment to Permit No. 02646T11 is a natural gas-fired shrink-wrap operation (ID No. I-shrinkwrap). No changes are made to this list in Permit No. 02646T12.

IV Current Equipment List:

The table below is a copy of the equipment list for the Fairfield Chair Company Plant No. 2 facility as it appears in Permit No. 02646T12. This equipment list has been modified from the one in Permit No. 02646T11 as follows: The descriptions of the lumber kilns and the wood furniture finishing operations have been modified for simplification and clarity; the description of ES-014 has been changed from "wood dust collection system" to "woodworking operations" (i.e. to describe the

source of the pollutants as opposed to the collection/transport system); the asterisk language has been removed [upon issuance of Permit No. 02646T12 the permit shield will apply to ES-016 and the lumber kilns do have applicable requirements (2Q .0317 for avoidance of 2D .1111)].

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-001	Wood-fired boiler (13.5 million Btu per hour maximum heat input)	CD-001	Zurn multicyclone (12 nine-inch diameter tubes)
ES-002	Wood-fired boiler (13.5 million Btu per hour maximum heat input)	CD-002	Zurn multicyclone (12 nine-inch diameter tubes)
ES-016	Natural gas-fired boiler (20.9 million Btu per hour maximum heat input)	N/A	N/A
ES-004 through ES-011 F-004	Wood furniture finishing operations including: <ul style="list-style-type: none"> • Eight dry filter-type spray booths; and • Wash off tank (40 inches by 80 inches) 	N/A	N/A
ES-014	Woodworking operations	CD-003, CD-005, CD-006	Three simple cyclones (42, 96 and 96 inches in diameter, respectively)
		CD-004 CD-007	One simple cyclone (132 inches in diameter), in series with one bagfilter (2,300 square feet of filter area)
F-001 through F-003	Three steam-heated lumber drying kilns	N/A	N/A

V Regulatory Review:

A discussion of the applicable air pollution control requirements follows:

A. Two wood-fired boilers (13.5 million Btu per hour maximum heat input rate, each, ID Nos. ES-001 and ES-002) each with an associated multicyclone (12 nine-inch diameter tubes, each, ID Nos. CD-001 and CD-002, respectively):

i. 2D .0504 “Particulates from Wood Burning Indirect Heat Exchangers”

This rule applies to boilers ES-001 and ES-002 and limits the allowable PM emissions (E) from these indirect heat exchangers to those described in the following equations:

$$E = \begin{cases} 0.15 & \text{If } Q \geq 10,000, \\ 0.70 & \text{If } Q \leq 10, \text{ and} \\ 1.1698(Q)^{-0.2230} & \text{If } Q \text{ is any other value} \end{cases}$$

where: E = allowable emissions (lb PM/10⁶ Btu); and
Q = maximum heat input (10⁶ Btu/hr)

For the Fairfield Chair Company – Plant No. 2 facility, Q is equal to 27 (10⁶ Btu/hr) and E is equal to 0.56 (lb PM/10⁶ Btu).

The Permittee conducted stack testing on boiler ES-001 on 1/8/02 and on boiler ES-002 on 1/9/02 to verify compliance with this emission limit. This testing (approved by SSCB, with corrections—see memo dated 5/29/02) indicates that the total PM emission rates from boilers ES-001 and ES-002 are 0.247 (lb PM/10⁶ Btu) and 0.178 (lb PM/10⁶ Btu), respectively.

Compliance with this rule is indicated.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing associated with 2D .0504 but will not require any additional testing to demonstrate compliance for these boilers. Additional testing will not be required since compliance was demonstrated by a comfortable margin via testing in January of 2002. Further, according to Table 1.6-1 of Supplement G to the 5th edition of the AP-42 document, the uncontrolled combustion of dry wood in a boiler is expected to result in total (condensable and filterable) PM emissions of 0.417 (lb/MMBtu). That is, in the case of boilers ES-001 and ES-002, wood is an inherently compliant fuel for purposes of this rule.

Permit No. 02646T12 will require monthly external/annual internal monitoring (with the associated recordkeeping) and semiannual reporting associated with rule 2D .0504 for these two wood-fired boilers.

Permit No. 02646T12 will also require the Permittee to submit the results of maintenance performed on the multicyclones within 30 days of a written request by DAQ.

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

This rule applies to boilers ES-001 and ES-002 and limits the SO₂ emissions from these combustion sources to 2.3 (lb/10⁶ Btu). Table 1.6-2 of Supplement G to the 5th edition of the AP-42 document predicts SO₂ emissions of 0.025 (lb SO₂/MMBtu) from the combustion of wood. Compliance with this rule is indicated.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing for 2D .0516 but (since wood fuel is an inherently compliant fuel) will not require any additional testing or monitoring, recordkeeping or reporting (MRR) requirements to demonstrate compliance for these two wood-fired boilers.

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

This rule requires that the Permittee “prevent, abate and control emissions generated from fuel burning operations and industrial processes where an emission can reasonably be expected to occur...” According to the inspection report dated 11/2/06, these boilers were manufactured in 1986. Therefore, except for visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under 2D .0535, paragraph (d) of this rule requires that 6-minute average VEs from these boilers 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 it 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 they do not also exceed 87% opacity.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing for 2D .0521 but will not require any additional testing for these boilers to demonstrate compliance with this rule unless the Permittee notes VEs that are above “normal” when conducting the required monitoring for these sources.

Permit No. 02646T12 will require daily monitoring and recordkeeping of VEs (with an allowance to miss up to 3 days of monitoring/recordkeeping per semiannual period) and semiannual reporting associated with rule 2D .0521 for these two wood-fired boilers.

iv. 2Q .0317 “Avoidance Conditions”

The Permittee has elected to avoid major source classification for purposes of Title III (i.e. NESHAP) via application of an avoidance condition under 2Q .0317 (see discussion under section VI of this document, below). The associated avoidance condition in Permit No. 02646T12 requires (1) monthly recordkeeping of fuel combustion in, and calculations of

HAP emissions from, the wood-fired boilers; and (2) semiannual reporting of this information to DAQ.

B. Natural gas-fired boiler (20.9 million Btu per hour maximum heat input, ID No. ES-016):

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

This rule applies to boiler ES-016 and limits the allowable PM emissions (E) from this indirect heat exchanger 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/10⁶ Btu), and
Q = maximum heat input (10⁶ Btu/hr)

Two No. 2 fuel oil boilers (ID Nos. ES-012 and ES-013) were removed from Permit No. 02646T11 in conjunction with the addition of boiler ES-016. Paragraph (e) of this rule states, in part, that in such an instance the heat input of the removed boilers should not be included in the determination of Q in the above equations. Therefore, for the Fairfield Chair Company Plant No. 2 facility, Q is equal to 20.9 (10⁶ Btu/hr) and E is equal to 0.56 (lb PM/10⁶ Btu).

Table 1.4-2 of Supplement D to the 5th edition of the AP-42 document predicts total PM emissions of 7.6 (lb/10⁶ ft³) from natural gas combustion. If we assume a natural gas heat value of 1,020 (Btu/ft³) then we can calculate PM emissions of:

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

Compliance with this rule is indicated.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing for 2D .0503 but (since natural gas is an inherently compliant fuel) will not require any additional testing or MRR requirements to demonstrate compliance for this boiler.

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

This rule applies to boiler ES-016 and limits the SO₂ emissions from this combustion source to 2.3 (lb/10⁶ Btu).

Table 1.4-2 of Supplement D to the 5th edition of the AP-42 document predicts SO₂ emissions of 0.6 (lb SO₂/10⁶ ft³) from the combustion of natural gas. Assuming a heat value of 1,020 (Btu/ft³) for natural gas we can calculate

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

Compliance with this rule is indicated.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing for 2D .0516 but (since natural gas is an inherently compliant fuel) will not require any additional testing or MRR requirements to demonstrate compliance for this boiler.

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

This rule requires that the Permittee “prevent, abate and control emissions generated from fuel burning operations and industrial processes where an emission can reasonably be expected to occur...” According to the inspection report dated 11/2/06, this boiler was manufactured in 1978. Therefore, except for visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under 2D .0535, paragraph (d) of this rule requires that 6-minute average VEs from these boilers 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 it 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 they do not also exceed 87% opacity.

Permit No. 02646T12 will include the standard language for the emission limits and testing for 2D .0521 but will not require any additional testing or MRR requirements for this boiler to demonstrate compliance with this rule.

iv. 2Q .0317 “Avoidance Conditions”

The Permittee has elected to avoid major source classification for purposes of Title III (i.e. NESHAP) via application of an avoidance condition under 2Q .0317 (see discussion under section VI of this document, below). Since the HAPs contribution from the natural gas-fired boiler is so small, the Permittee opted to “back out” the potential HAP emissions from this source. Therefore, the avoidance condition in Permit No. 02646T12 includes slightly tighter emission limits for HAPs but does not require any MRR related to this avoidance condition for the natural gas-fired boiler.

C. Wood furniture finishing operations consisting of eight dry filter-type spray booths (ID Nos. ES-004 through ES-011) and one wash off tank (ID No. F-004):

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

This rule 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 ...” This rule applies to the wood furniture finishing operation and the spray booths. Compliance with this rule is expected due to the presence of dry filters installed on the spray booths. No excessive VEs were noted in the inspection report associated with the most recent compliance inspection conducted on 11/1/06.

Permit No. 02646T12 will include the standard shell language for the control requirements of 2D .0512 but will not require any testing to demonstrate compliance for these sources.

Permit No. 02646T12 will require weekly dry filter/annual ductwork monitoring (with the associated recordkeeping) and semiannual reporting associated with rule 2D .0512 for the wood furniture finishing operations.

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

This rule requires that the Permittee “prevent, abate and control emissions generated from fuel burning operations and industrial processes where an emission can reasonably be expected to occur...” Except for visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under 2D .0535, paragraph (d) of this rule requires that 6-minute average VEs from the wood furniture finishing operations 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 it 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 they do not also exceed 87% opacity.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing for 2D .0521 but will not require any additional testing for the wood furniture finishing operations unless the Permittee notes VEs that are above “normal” when conducting the required monitoring for these sources.

Permit No. 02646T12 will require monthly monitoring and recordkeeping of VEs and semiannual reporting associated with 2D .0521 for the wood furniture finishing operations.

iii. 2D .0958 “Work Practices for Sources of Volatile Organic Compounds”

This rule applies to the operations in this facility that use VOCs as solvents, carriers, material processing media, etc. and requires the Permittee to follow certain procedures when using or storing the VOC-containing materials or cleaning or draining the equipment used to apply these materials. Permit No. 02646T12 will include the standard language for work practice standards and MRR associated with this rule for the facility-wide affected sources.

iv. 2D .1806 “Control and Prohibition of Odorous Emissions”

This rule applies to all sources at the facility and requires the Permittee to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility’s boundary. The Permittee is required to avoid such a situation by implementing management practices or installing and operating odor control equipment, when necessary. Permit No. 02646T12 will include the standard language associated with this rule for the facility-wide affected sources.

v. 2Q .0317 “Avoidance Conditions”

The Permittee has elected to avoid major source classification for purposes of Title III (i.e. NESHAP) via application of an avoidance condition under 2Q .0317 (see discussion under section VI of this document, below). The avoidance condition in Permit No. 02646T12 requires (1) monthly recordkeeping of HAP-containing material usage in the wood furniture finishing operations and calculations of the resulting HAP emissions; and (2) semiannual reporting of this information to DAQ.

D. Woodworking operations (ID No. ES-014) and associated:

Three simple cyclones (42, 96, and 96 inches in diameter, ID Nos. CD-003, CD-005, and CD-006, respectively); and

One simple cyclone (132 inches in diameter, ID No. CD-004) in series with one bagfilter (2,300 square feet of filter area, ID No. CD-007)

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

This rule 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 ...” This rule applies to the woodworking operations and associated control devices. Compliance with this rule is expected due to the presence of four cyclones and a bagfilter installed on the woodworking operations. No excessive VEs were noted in the report associated with the most recent compliance inspection conducted on 11/1/06.

Permit No. 02646T12 will include the standard shell language for the control requirements of 2D .0512 but will not require any testing to demonstrate compliance for these sources.

Permit No. 02646T12 will require monthly external (cyclones/ductwork/bagfilter) and annual internal (bagfilter) monitoring (with the associated recordkeeping) and semiannual reporting associated with rule 2D .0512 for the woodworking operations. Permit No. 02646T12 will also require the Permittee to submit the results of maintenance performed on the control devices within 30 days of a written request by DAQ.

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

This rule requires that the Permittee “prevent, abate and control emissions generated from fuel burning operations and industrial processes where an emission can reasonably be

expected to occur...” Except for visible emissions (VEs) occurring during startup, shutdown and malfunctions that are regulated under 2D .0535, paragraph (d) of this rule requires that 6-minute average VEs from the woodworking operations 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 it 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 they do not also exceed 87% opacity.

Permit No. 02646T12 will include the standard shell language for the emission limits and testing for 2D .0521 but will not require any additional testing for the woodworking operations to demonstrate compliance with this rule unless the Permittee notes VEs that are above “normal” when conducting the required monitoring for these sources.

Permit No. 02646T12 will require weekly monitoring and recordkeeping of VEs and semiannual reporting associated with 2D .0521 for the woodworking operations.

E. Three lumber drying kilns (ID Nos. F-001, F-002 and F-003):

These kilns have a combined capacity of 1,365,000 board feet per year (see 8/23/07 email from Rick Pierce of Fairfield Chair). The DAQ emission factor for VOCs from lumber kilns drying hardwoods is 0.34 pounds VOC per 1,000 board foot.

The DAQ emission factors for largest single/total HAPs from lumber kilns are 0.205/0.323 pounds per 1,000 board foot. These HAP emission factors are for southern yellow pine - as opposed to hardwood such as that processed at the subject facility. Nevertheless, since they are the only lumber drying kiln emission factors that the permit writer is aware of, these emission factors are used herein. Using these factors we estimate potential VOC/HAP emissions of:

VOCs	= [0.340][1,365,000]/1,000	= [464.1] pounds per year
		= [0.232] tons per year;
Largest HAP	= [0.205][1,365,000]/1,000	= [280.0] pounds per year
		= [0.140] tons per year; and
Total HAPs	= [0.323][1,365,000]/1,000	= [440.9] pounds per year
		= [0.220] tons per year;

Although these kilns qualify for exemption from permitting under 2Q .0503(8), they are listed in section 2.1 E of Permit No. 02646T12 due to the applicability of 2Q .0317.

i. 2Q .0317 “Avoidance Conditions”

The Permittee has elected to avoid major source classification for purposes of Title III (i.e. NESHAP) via application of an avoidance condition under 2Q .0317 (see discussion under section VI of this document, below). Since the HAPs contribution from the steam-heated lumber kilns is so small, the Permittee opted to “back out” the potential HAP emissions from these sources. Therefore, the avoidance condition in Permit No. 02646T12 will include slightly tighter emission limits for HAPs but will not require any MRR related to this avoidance condition for the lumber kilns.

VI NSPS/NESHAP/PSD/Toxics/112(r)/CAM Applicability:

NSPS: Boilers ES-001, ES-002 and ES-016 at this facility are not subject to the relevant standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60 Subpart Dc. These boilers meet the capacity thresholds [heat input capacities of 10 (MMBtu/hr) to 100

(MMBtu/hr)] but pre-date this regulation (applicability date of 6/9/89). Boilers ES-001 and ES-002 were manufactured in 1986 and boiler ES-016 was manufactured in 1978 (refer to the discussions in sections V.A.iii and V.B.iii of this document, above).

NESHAP: This facility has avoided the applicability of 40 CFR Part 63 via the application of an avoidance condition. The otherwise-applicable MACT standards [i.e. Subparts JJ (for Wood Furniture Manufacturing) and DDDD (for Plywood and Composite Wood Products) only apply to facilities that are major for purposes of Title III [refer to §63.800(a) and §63.2231(b), respectively].

The MACT avoidance condition of Permit No. 02646T11 neglected to require the Permittee to include HAP contributions from the boilers or the lumber kilns. According to current DAQ boiler spreadsheets, potential (largest single/total) HAP emissions from the two wood-fired boilers (combined) and the natural gas-fired boiler are 2.25/4.59 and 0.16/0.17 tons per year, respectively. According to the currently-accepted DAQ steam-heated kiln emission factors, the potential (largest single/total) HAP emissions from the three steam-heated lumber kilns are 0.14/0.22 tons per year.

Since HAP emissions from the natural gas-fired boiler and the lumber kilns are so small, the Permittee elected to reduce the HAP emissions limits of the MACT avoidance condition by an amount equal to the potential HAP emissions from these sources, thereby avoiding any MRR requirements for these sources associated with the MACT avoidance condition (refer to the discussions in sections V.A.iv, V.B.iv, V.C.v and V.E.i of this document, above). Therefore, the HAP emissions limits of the MACT avoidance condition are:

Largest HAP = $10 - 0.16 - 0.14 = 9.70$ tons per year; and

Total HAPs = $25 - 0.17 - 0.22 = 24.61$ tons per year

PSD: This facility does not fall into one of the “named” PSD categories with major source thresholds of 100 ton per year but does have the unlimited potential to emit > 250 tons of VOCs per year. This facility is classified as major for PSD purposes. Application 1400041.05A (i.e. the renewal of Permit No. 02646T11) does not involve a modification. Therefore, neither PSD review nor increment tracking is triggered at this time.

Toxics: Permit No. 02646T11 does not include any specific conditions associated with the NC Toxics Program. Application 1400041.05A (i.e. the renewal of Permit No. 02646T11) does not involve a modification. Therefore, a toxics review is not triggered at this time.

Since this facility is not subject to any MACT standards (refer to the discussion of NESHAP in this section, above), Permit No. 02646T12 will not include the “last MACT” trigger language for toxics.

112(r): This facility does not use, handle, or store any regulated materials onsite in quantities in excess of the associated thresholds and is therefore not subject to the requirements of this regulation other than general duty (refer to the letter from Mr. Larry Hollar, the Responsible Official of Fairfield Chair Company – Plant No. 2, dated 8/29/07).

CAM: There are no sources at this facility with any CAM requirements. DAQ considers dry filters on spray booths to be an integral part of the source and not control devices. Therefore, only three sources (i.e. the two wood-fired boilers and the wood dust collection system) utilize control devices to comply with an emission limit. None of these sources has the before-control potential to emit more than 100 tons per year of the controlled pollutant and CAM does not apply (refer to the letter from Mr. Hollar dated 8/29/07).

VII Other regulatory considerations:

Compliance Status: The facility was most recently inspected on 11/1/06 by Mike Parkin of the ARO and appeared to be operating in compliance with air quality standards and regulations during that inspection (refer to the inspection report dated 11/2/06).

Application Fee: An application fee is not required for this permit renewal application since it does not also involve a physical modification or expansion.

Zoning Consistency: A zoning consistency determination request is not required for this permit renewal application since it does not involve a physical facility modification or expansion.

VIII Permit Modifications/Changes:

The following table briefly summarizes the changes in Permit No. 02646T12 resulting from Permit Application No. 1400041.05A:

Old Page(s)	New Page(s)	Condition/Item	Description of Change(s)
Part I			
Global	Global	N/A	<ul style="list-style-type: none"> Change permit revision number to T12 Change the issuance/effective dates of the permit Modify the descriptions of the wood furniture finishing operations, the woodworking operations and the boilers
3	3	Equipment List	Remove asterisk language for boiler ES-016 and lumber kilns F-001 through F-003
4 - 6	4 - 6	2.1 A	Modify section 2.1 A to include the requirements for both wood-fired boilers
4, 6, 7, 8 and 11	4, 6, 7 and 10	2.1 A, B, C and E	Add HAPs to list of regulated pollutants in the summary tables of limits/standards for boilers, finishing and kilns
4	N/A	2.1 A.1.c (02646T11)	Remove additional testing requirements for wood boilers
5, 9 and 11	5, 8 and 10	2.1 A.3.c, C.2.c and D.2.c	Remove requirement to establish “normal” for VEs and update 2D .0521 monitoring language to current shell
5	5	2.1 A.3.c	Allow for up to 3 days of absent VE observations for wood fired boilers per semiannual period
8	7	2.1 C	Modify limits/standards table for wood furniture finishing operations to reflect changes in section 2.2 and change rule reference to 2Q .0317 for HAPs limits
9 and 11	8-9 and 10	2.1 C.2.d-e and D.2.d-e	Add specific 2D .0521 recordkeeping and reporting language for wood furniture finishing and woodworking operations
11	10	2.1E	Move kilns from section 2.2 A to 2.1 E and include their HAP emissions in the avoidance requirements
11 - 13	11 - 13	2.2	<ul style="list-style-type: none"> Modify section 2.2 to exclude the lumber kilns and renumber the subsections as 2.2 A.1, A.2 and A.3 Modify limits/standards table to reference 2Q .0317 for the MACT avoidance (i.e. avoidance of 2D .1111)
13	11 - 12	2.2 A.1	Remove asterisk language indicating that the permit shield does not apply to the MRR for rule 2D .0958
11 - 12	12 - 13	2.2 A.3	Modify this subsection to account for HAP emissions from the boilers and lumber kilns and change reporting frequency from quarterly to semiannual
14 - 21	14 - 21	Section 3	Update General Conditions to the current shell version
Part II			
22 - 24	N/A	Sections 1-3 (02646T11)	Delete Part II

Note: “Condition/Item” in the table above refers to the permit condition and item number as it appears in Permit No. 02646T12 except where otherwise noted.

IX Title V Permit History:

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

Permit No.	Issuance Date	Description of Revision
02646T10	01/12/01	Issue initial Title V permit
02646T11	12/05/01	<ul style="list-style-type: none">• Add boiler ES-016• Remove boilers ES-012 and ES-013
02646T12	11/30/07	Renew the Title V permit

X Application 1400041.05A Chronology:

03/31/05: DAQ received application 1400041.05A on March 31, 2005 to renew current Title V Permit No. 02646T11.

07/18/07: RCO, ARO, and the Permittee reviewed the draft version of Permit No. 02646T12.

10/16/07: Draft Permit No. 02646T12 was sent out for public comment and to EPA Region 4 staff for concurrent review.

11/15/07: No public comments received - therefore no public hearing scheduled by NC DAQ.

11/29/07: After receiving notification that EPA Region 4 staff had no comments (see email dated XX/XX/07), NC DAQ issued Permit No. 02646T12.

XI Permit Review:

A draft version of Permit No. 02646T12 was sent to the Permittee and the ARO for a review and comment period on 7/18/07. Neither the Permittee nor the ARO requested any changes to the draft version of Permit No. 02646T12.

XII Recommendation:

The Title V Permit renewal application for the Fairfield Chair Company – Plant No. 2 facility in Lenoir, Caldwell 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. 02646T12.

Issuance of Permit No. 02646T12 to Fairfield Chair Company – Plant No. 2 is recommended.