

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2008**

**Region:** Winston-Salem Regional Office  
**County:** Davidson  
**NC Facility ID:** 2900179  
**Inspector's Name:** Steve Moser  
**Date of Last Inspection:** 12/11/2007  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> Lexington Furniture Inc., Plant 5  <b>Facility Address:</b> Lexington Furniture Inc., Plant 5 1893 Brown Street Lexington, NC 27292  <b>SIC:</b> 2511 / Wood Household Furniture <b>NAICS:</b> 337122 / Nonupholstered Wood Household Furniture Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 2900179.08A <b>Date Received:</b> 02/15/2008 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 04015/T12 <b>Existing Permit Issue Date:</b> 09/13/2004 <b>Existing Permit Expiration Date:</b> 12/31/2008
Tina Darnell Benefits Manager (336) 474-5466 1300 National Highway Thomasville NC, 27360	Bob Sitler Vice President (336) 474-5300 1300 National Highway Thomasville NC, 27360	Tina Darnell Benefits Manager (336) 474-5466 1300 National Highway Thomasville NC, 27360	
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2008</b>		<b>Comments / Recommendations:</b> Issue 04015/T13 <b>Permit Issue Date:</b> <b>date, 2008</b> <b>Permit Expiration Date:</b> <b>date, 2013</b>	

**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 (**04015T12**) was issued on **September 13, 2004**, and is currently scheduled to expire on **December 31, 2008**. The renewal application was received on **February 15, 2008**, 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 is a wood furniture manufacturer.

### III. History/Background/Application Chronology

**February 15, 2008** – Permit application **2900179.08A** was received for the renewal of the current Title V permit.

**March 4, 2008** – Received verification from the Permittee that there have been no changes to the permitted equipment list which would cause an increase in PM<sub>10</sub> emissions above those levels shown in the CAM applicability analysis done in 2004 and that at this time Plant 5 would like to keep all of the same equipment on the permit. This letter is in response to an email that Mark Cuilla sent asking for the specific information provided.

**March 17, 2008** – Received Comments and Recommendations from Steve Moser of the WSRO. He noted no needed permit modifications as part of this permit renewal.

**April 15, 2008** – DRAFT permit sent to Permittee, Regional Office, Title V Coordinator for comment prior to public notice and EPA review.

**Date, 2008** – DRAFT sent to 30-day public notice and 45-day EPA 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(s)	Section	Description of Change(s)
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3-5	Equipment table	-added “firetube design” to description of boilers -added ID Nos. per source for finishing equipment per ESM breakdown -added MACT Subpart designation for kilns
6	2.1 A 2.1 A.1.c	-grouped all wood-fired boilers into one permit Section -added testing requirement (renumbered subsequent sections)
7	2.1 A.1.f	-added ID Nos.
8	2.1 A.3.d	-updated shell language
9	2.1 B	-amended equipment description
10	2.1 B.3.c	-updated shell language
11	2.1 C 2.1 C (table) 2.1 C.1.b	-amended equipment description -clarified sulfur dioxide emission limit -corrected cross reference
12	2.1 C.2.b 2.1 C.2.c 2.1 C.2.f 2.1 C.3.b	-corrected cross reference -updated shell language -added “no reporting” language -corrected cross reference
13	2.1 C.3.d 2.1 C.3.f 2.1 C.4.b	-updated shell language -added “no reporting” language -corrected cross reference
14	2.1 D 2.1 D.1.b	-amended equipment description -corrected cross reference

Page(s)	Section	Description of Change(s)
15	2.1 D.2.b 2.1 D.3.b 2.1 E  2.1 E (table)	-corrected cross reference -corrected cross reference -amended equipment description -grouped previously separate permit Sections (renumbered subsequent Sections) -added ID No. clarifications
16-18	2.1 E.1-3	-added ID Nos. for newly grouped permit Section
20	2.1 F.2.c 2.1 F.2.d	-corrected cross reference -updated shell language
21	2.1 G.2.b	-corrected cross reference
22	2.1 G.2.c	-updated shell language
24	2.1 H.3.c	-updated shell language
25	2.1 I.1.a 2.1 J (table) 2.1 K	-updated shell language -added MACT Subpart reference -amended equipment description
26	2.1 K (table) 2.2 B	-added table of applicable standards -amended equipment descriptions
36-45	General Conditions	-updated shell conditions (v2.20)

*It should be noted that ESM was compared to the renewed permit for accuracy in equipment descriptions. No significant changes in ESM were required as part of 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 Woodburning Indirect Heat Exchangers  
15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants  
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart Kb)  
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart JJ)  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

A regulatory review for the existing sources will not be included in this document.

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

**NSPS** – The facility’s one fixed roof fuel oil storage tank (**ID No. ES4-T1**) is currently subject to the New Source Performance Standards for Storage Tanks (40 CFR 60, Subpart Kb). To ensure compliance with this requirement, the Permittee is required to maintain records of the tank dimensions and tank capacity. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is currently subject to the National Emission Standard for Hazardous Air Pollutants (HAPs) for Furniture Facilities (40 CFR 63, Subpart JJ). The permit limits emissions from finishing, cleaning, and contact adhesives. Specific monitoring, recordkeeping, and reporting activities are required for each type of process. This permit renewal does not affect the status of this regulation.

The facility currently operates lumber drying kilns (**ID No. ES4-K1**). These kilns subject the facility to the requirements of 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants from Plywood and Composite Wood Production. While subject to the Subpart, the Permittee is only required to submit Initial Notifications for the kilns. This has been completed and the facility is in compliance with the Subpart.

The facility currently operates a combination of wood and fuel oil-fired boilers (**ID Nos. ES4-B1, ES4-B2, ES4-B3, ES4-B4, ES4-B6, ES5-B6, and ES5-B7**). These boilers subject the facility to the requirements of the combustion MACT (40 CFR 63, Subpart DDDDD). It should be noted that this MACT has been vacated and does not currently apply to any source. However, it is expected that EPA will either promulgate a new MACT or require the States to implement 112(j) Case-by-Case MACT for these sources in the future. Under the vacated MACT, each boiler would have been identified as a small boiler based on the fact that each is of a firetube design. This designation has been added to the renewed permit for future use. Until such time as a decision has been made on this Subpart, no requirements will be added to the permit as part of this permit renewal.

**PSD** – The facility currently operates under two separate PSD Avoidance conditions.

The first is for volatile organic compounds from the fourteen finishing booths (**ID Nos. ES5-F1.1 through ES5-F1.14**). To avoid applicability of PSD, the Permittee is required to limit VOC emissions from these sources to less than 250 tons per year. To ensure compliance with this requirement, the Permittee is required to calculate monthly and annual VOC emission totals based on material consumption and VOC content of the material. This permit renewal does not affect the status of this regulation.

The second is for sulfur dioxide from one natural gas/Nos. 2/5/6 fuel oil-fired boiler (**ID No. ES4-B6**). To avoid applicability of PSD, the Permittee is required to limit sulfur dioxide emissions from this source to less than 40 tons per year and less than 6,750 hours of operation per year. To ensure compliance with these requirements, the Permittee is required to maintain monthly records of the hours of operation for this source. This permit renewal does not affect the status of this regulation.

**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. This permit renewal does not affect this status.

**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 significant modification completed in September 2004 removed the requirement that the facility comply with CAM. Previous to that application, CAM had been incorrectly applied to the control devices controlling the woodworking equipment (See Mark Cuilla's Permit Review for 04015T12 for detailed explanation and history). The Permittee has verified that there have been no changes to the permitted equipment list that would now make CAM applicable to the facility. Therefore, the permit has been renewed without CAM requirements.

## VII. Facility Wide Air Toxics

The facility is not currently subject to North Carolina Air Toxics regulations. This permit renewal does not affect this status.

However, the facility is currently subject to two different MACT standards as noted above. The first, Subpart JJ, does not represent the last MACT to apply to this facility because per the 15A NCAC 2Q .0702(a)(23) exemption, Subpart JJ sources are exempt from air toxics. The second, Subpart DDDD, also does not represent the last MACT to apply to this facility because the Permittee has verified that its wood fuel-fired boilers accept fuel from a supplier who is known to have plywood materials mixed in with the wood dust. So these wood-fired boilers will not meet the exemption for combustion sources per 15A NCAC 2Q .0702(a)(18) because they combust adulterated fuels. The current MACT for combustion sources has been vacated as discussed above. Therefore, once promulgated, it will become the last MACT to apply to this facility. As such the Permittee will be required per 15A NCAC 2Q .0705 to be in compliance with NC Air Toxics for all non-exempt sources at the same deadline of the promulgated MACT. Until then, no new regulations are necessary as part of this permit renewal.

## VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)
CO	19.66
NO <sub>x</sub>	16.17
PM <sub>10</sub>	13.56
SO <sub>2</sub>	1.46
VOC	38.71
Total HAP/TAP	3.67

## IX. Stipulation Review

WSRO did not recommend any necessary permit revisions as part of this permit renewal. In his latest inspection report, Steve Moser indicated that based on the inspection and data reviewed, the facility appeared to be operating in compliance.

## 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 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. Mecklenburg and Forsyth Counties are affected Local Programs within 50 miles of the facility.

## **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.

WSRO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance (See History Section of this Document for a listing of dates).

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