

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

## Application Review

**Issue Date:**

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100854  
**Inspector's Name:** Thomas Gray  
**Date of Last Inspection:** 06/19/2024  
**Compliance Code:** W / Violation - procedures

Facility Data				Permit Applicability (this application only)					
<b>Applicant (Facility's Name):</b> Marsh Furniture Company  <b>Facility Address:</b> Marsh Furniture Company 1001 South Centennial Street High Point, NC 27260  <b>SIC:</b> 2434 / Wood Kitchen Cabinets <b>NAICS:</b> 337110 / Wood Kitchen Cabinet and Countertop 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> 02D:.0503, .0504, .0512, .0516, .0521, .0524, .0530, .0614, .1111, .1806 <b>NSPS:</b> Dc <b>NESHAP:</b> 40 CFR 63, JJ, DDDDD <b>PSD:</b> VOC <b>PSD Avoidance:</b> 02Q .0317(VOC) <b>NC Toxics:</b> n/a <b>112(r):</b> n/a <b>Other:</b>					
Contact Data				Application Data					
Facility Contact	Authorized Contact	Technical Contact	<b>Application Number:</b> 4100854.24A <b>Date Received:</b> 08/22/2024 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 03238/T27 <b>Existing Permit Issue Date:</b> 03/05/2024 <b>Existing Permit Expiration Date:</b> 04/30/2025						
Bruce Braswell Regulatory Compliance Manager (336) 819-4035 PO Box 870 High Point, NC 27261	Edwin Underwood President/COO (336) 819-4051 PO Box 870 High Point, NC 27261	Bruce Braswell Regulatory Compliance Manager (336) 819-4035 PO Box 870 High Point, NC 27261							
<b>Total Actual emissions in TONS/YEAR:</b>									
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP		
2022	0.5040	10.41	373.46	0.8400	0.6046	33.15	16.99 [Methanol (methyl alcohol)]		
2021	0.5240	10.80	399.43	0.9150	0.6158	41.55	20.18 [Methanol (methyl alcohol)]		
2020	0.4950	10.38	368.52	0.9630	0.8100	38.24	19.22 [Methanol (methyl alcohol)]		
2019	0.5740	11.89	328.74	0.8990	0.8223	37.55	17.29 [Methanol (methyl alcohol)]		
2018	0.5230	10.77	293.73	2.95	1.71	34.26	15.23 [Methanol (methyl alcohol)]		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>Review Engineer:</b> Suraiya Akter   <b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____         </td> <td style="width: 50%; vertical-align: top;"> <b>Comments / Recommendations:</b>  <b>Issue</b> 03238/T28  <b>Permit Issue Date:</b> _____  <b>Permit Expiration Date:</b> _____         </td> </tr> </table>								<b>Review Engineer:</b> Suraiya Akter  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____	<b>Comments / Recommendations:</b> <b>Issue</b> 03238/T28 <b>Permit Issue Date:</b> _____ <b>Permit Expiration Date:</b> _____
<b>Review Engineer:</b> Suraiya Akter  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____	<b>Comments / Recommendations:</b> <b>Issue</b> 03238/T28 <b>Permit Issue Date:</b> _____ <b>Permit Expiration Date:</b> _____								

## 1. Purpose of Application

Marsh Furniture Company ("MFC") owns and operates a factory in Guilford County under Title V Operating Permit No. 03238T27 issued by the North Carolina Department of Environmental Quality (DEQ), Division of Air Quality (DAQ), on March 05, 2024.

The MFC submitted this application to request renewal of the air permit on August 22, 2024, thereby meeting the requirement at General Condition K of the effective permit at the time (03238T27) to submit the renewal application at least six months before the date of permit expiration (April 30, 2025). Hence, MFC is covered under the application shield pursuant to 15A NCAC 02Q .0512(b).

## 2. Facility Description

According to the most recent inspection report, this facility manufactures wooden kitchen and bathroom cabinets. Activities include woodworking, furniture finishing, and a wood-fired boiler. The facility normally operates eight hours per day, five days per week.

## 3. History/Background/Application Chronology

### History

May 15, 2020	TV permit renewal issued. Air Permit No. 03238T25 was issued on May 15, 2020, with an expiration date of April 30, 2025.
July 01, 2022	Permit revision no. T26 issued in response to application no. 4100854.22A. This application was the first step of a two-step significant modification application process. The modification included adding new modern spray booths to replace the existing spray booths and rearrange several spray booths and associated activities within the facility to support the new spray booths
March 06, 2024	Permit revision no. T27 issued in response to application no. 4100854.23B. This application was the second step of the two-step significant modification application process initiated as discussed in the July 01, 2022 entry above. The application also included two 502(b)(10) changes (application nos. 4100854.21A and 23A). These changes were to add small gas-fired heaters to the sealer line (ID NFLS-5) and topcoat line (NFLS-3) and move a spray booth (SB-R1) to be closer to the Barberan spray booths.
June 20, 2024	The facility was inspected by Thomas Gray of Winston Salem Regional Office and the facility appeared to be in compliance at the time of inspection

### Application Chronology

August 22, 2024	Received permit application 4100854.24A for renewal.
August 22, 2024	Sent acknowledgment letter indicating that the application for permit renewal was complete.

November 08, 2024	Initial Draft permit and review forwarded to Supervisor for comments.
December 03, 2024	Supervisor (Joe Voelker) gave feedback on the draft verbally about the organization of the draft
January 16, 2025	Edited draft forwarded to Joe for comments
February 18, 2025	Supervisor emailed back the edited draft and technical review with major revisions on organization of the draft, explanation for the updated MACT DDDDD rules and the CAM revision
March 03, 2025	Technical ADD INFO (PFAS questionnaire) was sent to applicant
March 17, 2025	Received response to the ADD INFO request sent on March 3 <sup>rd</sup>
March 18, 2025	Updated draft was forwarded to Supervisor Joseph Voelker
March 27, 2025	Received feedback from Supervisor
April 4, 2025	Edited draft forwarded to region, applicant, and SSCB for review.
April 8, 2025	Samir Parekh from SSCB replied with no comments
April 16, 2025	Received applicant's comment. Except for minor typo correction, MFC presented a DC circuit court decision from late 2024 that sets aside the EPA's 2022's rule. See more details in section 6.
May 06, 2025	Received feedback from Gray Thomas from WSRO, added an incident NOV in section.
date	Draft permit and permit review forwarded to public notice via DAQ website.
date	Public comment period ends.
date	EPA comment period ends.
date	Permit issued.

#### 4. Permit Modifications/Changes and TVEE Discussion

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

Pages	Section	Description of Changes
--	Cover page and throughout	Updated all dates and permit revision numbers.
6	Permitted emission Source Table	Added the word "CAM" with the source WWCS1 as the source is subjected to CAM
9	2.1 A.2.c	<p><u>02D .0521 condition</u></p> <p>Removed the condition "the permittee shall establish "normal" for these sources (ID No. BL) in the first 30 days following the beginning of operation of these sources as this requirement has been met.</p>
10	2.1 B	<ul style="list-style-type: none"> <li>Added table 2.1B to replace the source description in bullet points at the beginning of this section</li> <li>Added bag filters BF8, BF9, and BF10 in the summary table of limits and standards for emission sources</li> </ul>
11	2.1 B.3	<p><u>02D .0614 condition</u></p> <ul style="list-style-type: none"> <li>Added emission sources WW-8, 9, 10 and their associated bag filters BF8, 9, and 10 in the current CAM condition. 02D .0614 (CAM) condition</li> <li>Table under monitoring section was reformatted as with the current DAQ standard without changing any requirements</li> <li>The condition to submit an administrative amendment application for BF8, 9 and 10 has been removed</li> </ul>
17	2.1 D.4	<p><u>NSPS Subpart Dc condition</u></p> <ul style="list-style-type: none"> <li>New source performance standards conditions were restructured as per current DAQ standard format</li> <li>In the recordkeeping section "In addition to" was removed</li> <li>A reporting/notification requirement for the initial startup is added</li> </ul>
17	2.1 D.5.f	<p><u>MACT DDDDD condition</u></p> <ul style="list-style-type: none"> <li>Section was updated as per DAQ's current format and requirements without any substantial changes in conditions.</li> </ul>
27	2.2 C.1	<p><u>MACT JJ condition</u></p> <p>The MACT JJ conditions were restructured and renumbered consistent with current DAQ permitting shell and policy. No substantial changes in the applicable requirements were made.</p>

Pages	Section	Description of Changes
34	2.3.A	Removed the section “permit shield for non-applicable requirements. See Section 7 of review for explanation.
35	4	Updated General Conditions to v8.0.

This permit renewal is without modification, and no changes to the Title V Equipment Editor are needed.

## 5. Regulatory Review

Changes to the facility’s equipment and operations since the last renewal are shown in Section 3 above.

MFC is subject to the following regulations. Each regulation will be discussed individually below. Unless stated otherwise below or in the Table of Changes (Section 4 above), no substantial changes will be made to the existing permit condition.

- 15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 02D .0504, Particulates from Wood Burning Indirect Heat Exchangers
- 15A NCAC 02D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
- 15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 02D .0521, Control of Visible Emissions
- 15A NCAC 02D .0524, New Source Performance Standards
- 15A NCAC 02D .0530, PSD Avoidance Conditions
- 15A NCAC 02D .0614, Compliance Assurance Monitoring
- 15A NCAC 02D .1111, Maximum Achievable Control Technology
- 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 02Q .0317, Avoidance Conditions

### 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

This rule limits the particulate matter (PM) emissions from indirect heat exchanger. The boiler B3 is subject to this rule. The PM limit is defined by the following equation:

$$E = 1.090 * Q^{-0.2594}$$

Where, E = allowable emission limit for particulate matter in pounds per million Btu (lb/MMBtu)  
Q = maximum heat input in million Btu per hour (MMBtu/hr)

The Q for the B3 is 8.4 MMBtu/hr, therefore the E = 0.628 lb/MMBtu

The B3 is fired only using natural gas and the particulate emission rate is 0.007 lb/MMBtu, therefore compliance is expected. No additional monitoring, recordkeeping or reporting is required for particulate emissions of firing natural gas for this source.

02D .0504 "Particulates from Wood Burning Indirect Heat Exchangers"

This rule limits particulate emissions from boilers that burn only wood. The emission limit is a function of the woodburning capacity of the entire facility. The boiler B2 is subject to this rule. Emissions of particulate matter from the combustion of wood shall not exceed the allowable emission rate calculated by the equation:

$$E = 1.1698 * Q^{-0.2230}$$

where, E = allowable emission limit for particulate matter in lb/million Btu.

Q = Maximum heat input in million Btu/hour.

Based on a facility-wide wood fuel heat input rate of 18.45 million Btu per hour, E calculates to 0.61 lb/million Btu, therefore emission of PM from the combustion of wood from this boiler shall not exceed 0.61 lbs/mmBtu heat input. The existing permit also prohibits burning "chlorinated or non-chlorinated plastics and/or resins, or any wood waste which has been adulterated by finishes and/or coatings whose solid content contains compounds containing chlorine." To ensure compliance with the PM limit for the boiler, the facility is also required to perform inspections and maintenance as recommended by the manufacturer. At a minimum, the inspection and maintenance requirements must include a monthly external visual inspection of the system ductwork and material collection unit for leaks and an annual internal inspection of the multicyclone's structural integrity.

In order to comply with the particulate emission limit, MFC has installed a multicyclone in series with an electrostatic precipitator. MFC must operate, inspect, and maintain the control devices, and keep records of all maintenance and monitoring activities. The permit specifically requires that MFC monitor and maintain a minimum voltage and current in the electrostatic precipitator. Based on the most recent inspection report, the minimum values are 88 volts and 1.4 amps, respectively. MFC must submit reports of the maintenance and monitoring activities twice per year.

Based on the most recent inspection report, MFC appears to be in compliance with this rule. Continued compliance will be determined with subsequent inspections and reports.

02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"

This rule limits particulate emissions from all wood products finishing operations. Each of the woodworking, painting, and coating operations at this facility are subject to this rule. In general, the rule only requires that the facility operate provide appropriate ductwork and control for particulate emissions. The rule does not have a specific emission limit.

In order to comply with the rule, MFC uses bagfilters, cyclones, and dry fabric filters throughout the facility. In addition, MFC performs regular inspections of the ductwork and control devices for continued compliance. Records of inspections must be kept and reported twice per year.

Based on the most recent inspection report, MFC appears to be in compliance with this rule. Continued compliance will be determined with subsequent inspections and reports.

02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

This rule limits sulfur dioxide ("SO<sub>2</sub>") from fuel burning sources with no other specific SO<sub>2</sub> emission limits. This rule applies to each fuel burning source at this facility. In all cases, the limit is 2.3 lb/MMBtu. The only fuels burned at this facility are natural gas and wood. These fuels have inherently low sulfur content and hence emit SO<sub>2</sub> well below the allowable limit. Consistent with current DAQ permitting policy no monitoring, recordkeeping or reporting is required for sulfur dioxide emissions from the firing of natural gas or wood in these sources.

No changes are necessary to the existing permit conditions.

During the most recent inspection, MFC was found in compliance with this rule and continuous compliance is expected.

02D .0521 "Control of Visible Emissions"

This rule limits visible emissions ("VE") from emission sources with no other specific VE emission limit. In general, none of the sources should not exceed the 20% opacity limit when averaged over a six-minute period.

For the woodworking and furniture finishing operations, MFC demonstrates compliance with the VE limit with regular observations of the emission points around the facility. Records of observations must be kept and reported twice per year. Permit revision T26 added a condition for the source Barberan Line (ID No. BL) to establish "normal" in the first 30 days following the beginning of the operation of the source. The "normal" was established within 30 days therefore this condition has been removed.

Because MFC operates a continuous opacity monitoring system ("COMS") for the boiler B2, compliance with the opacity limit for B2 is determined according to 02D .0521(g). For such systems, the exceptions to the 20% limit are different: (1) No more than four six-minute periods shall exceed the opacity standard in any one day; and (2) The percent of excess emissions in any calendar year quarter shall not exceed 0.8% of the total operating hours. Startups, shutdowns, malfunctions, and maintenance are excluded from these periods. No monitoring, recordkeeping and reporting is required for the natural gas-fired boiler B3.

Based on the most recent inspection report, MFC is in compliance with this rule as it is written in the existing permit. Continued compliance with this rule will be determined with subsequent inspections and reports.

02D .0524 "New Source Performance Standards" ("NSPS"; 40 CFR Part 60)

This rule incorporates the NSPS rules into North Carolina's SIP. The only NSPS rule that applies to this facility is Subpart Dc "Small Industrial-Commercial-Institutional Steam Generating Units".

Boiler B2 is subject to this rule as it has a heat input greater than 10 MMBtu/hr and was constructed after 1989. For such boilers, the only requirement is to keep a monthly record of the amount of fuel fired. There are no reporting requirements.

The permittee was required to submit a notification of the actual date of initial startup of the boiler to the Regional Supervisor, postmarked within 15 days after such date. The Boiler startup was March 5, 2018, and the permittee submitted the Notification on March 15, 2018. Therefore, the non-compliance statement based on the failure to submit this Notification is removed from the section 2.1A.4.c.

The specific conditions for NSPS Subpart Dc in the existing permit do not follow the format of DAQ's other Title V permits; these conditions will be reformatted in the new permit. This formatting change does not reflect a physical change at the facility and is not intended to affect MFC's compliance requirements.

During the most recent inspection, MFC was found in compliance with this rule and continuous compliance is expected.

#### 02D .0530 Prevention of Significant Deterioration (PSD):

MFC is a major source for PSD permitting because it has potential (and actual) emissions of VOC greater than the major source threshold of 250 tpy.

MFC is currently a major source of VOC, and it has a VOC emissions limit of 659.17 tpy per consecutive 12-month period. MFC initially obtained a PSD limit and Best Available Control Technology (BACT) limit on 800 tpy VOC in 2002 (permit revision no. T15). Later in 2022, the facility wide PSD limit was adjusted to 659.17 tpy by removing sources (permit revision no. T26).

In order to demonstrate compliance, MFC keeps a record of material usage and VOC emissions for all PSD-subject activities. A summary report of the recordkeeping activities must be submitted twice per year.

Based on the most recent inspection report, MFC appears to be in compliance with this rule. From January of 2023 through December of 2023, the facility emitted 173.98 tons of VOC from the applicable sources. Continued compliance will be determined with subsequent inspections and reports.

#### 02D .0614 "Compliance Assurance Monitoring" ("CAM"; 40 CFR Part 64)

See Section 6.

#### 02D .1111, Maximum Achievable Control Technology (MACT)

This rule incorporates the MACT rules into North Carolina's SIP. For the purposes of MACT applicability, this facility is considered a major source of hazardous air pollutants ("HAPs"). By default, rules that apply to only area sources of HAPs do not apply to this facility. Ultimately, there only two MACT rules that apply to the activities at this facility. See Section 6 for detailed information.

#### 02D .1806, Control and Prohibition of Odorous Emissions



This regulation is state enforceable only. Continued compliance is anticipated.

#### 02Q .0317, Avoidance Conditions

MFC has accepted a permit limit on VOC emissions to avoid 15A NCAC 02D .0530, Prevention of Significant Deterioration (PSD) on July 1st, 2022 (permit revision no. T26) after a significant modification to the facility. To ensure compliance with this condition, the facility is required to limit VOC emissions to 180.79 tons per consecutive 12-month period from the following sources: Spray booths (Barerban5 through 7), Washoff tanks (ESWO6 through 8), and Backup boiler (B3).

Calculations of VOC emissions from these sources shall be made at the end of each month. MFC will calculate the VOC emissions from the spray booths and washoff tanks using mass-balance calculations (i.e., 100% of VOC used in these sources will be considered emitted) and using AP-42 factors for the backup boiler. MFC will keep records of VOC usage and emission calculations and submit a semiannual summary report. The report shall contain the monthly VOC emissions for the previous 17 months.

The most recent inspection indicates that the facility is completing and retaining the records. emissions shall be calculated for each of the 12-month periods over the previous 17 months. The last report was received on January 30, 2024 with the required information. From January of 2023 through December of 2023, the facility emitted 105.60 tons of VOC from the applicable sources. Compliance is indicated.

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

#### NSPS

This facility is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subpart Dc. Only the stoker type fuel-fired Boiler (**ID No. B2**) is subject to this Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. It is required to comply with all applicable provisions including the notification, testing, reporting, record-keeping, and monitoring requirements. The facility is expected to be in continued compliance.

#### NESHAP/MACT

For the purposes of MACT applicability, this facility is a major source of hazardous air pollutants (HAP) because it emits more than 10 tpy of an individual HAP and 25 tpy of total HAP. The following MACT rules apply to the facility:

##### 1. Subpart JJ "Wood Furniture Manufacturing Operations"

This rule applies to wood furniture manufacturing operations that are also major sources of HAPs. The entire facility is subject to this rule.

The rule limits HAP emitted from various furniture manufacturing operations and provides several options for demonstrating compliance. MFC complies with the HAP limits without using add-on control devices. Instead, MFC uses the averaging method discussed in §63.804(a) or the compliant materials method §63.804(b). In order to demonstrate compliance, MFC must keep records of materials used and show that materials meet the compliant coatings definition or that the overall material usage

at the facility meets the facility averaging option. In addition, the rule requires good work practices and operator training for activities involving coatings.

MFC must keep records of material usage, calculations, operator training, and good work practice activities. MFC must submit a summary report of the recordkeeping activities twice per year.

Based on the most recent inspection report, MFC appears to be in compliance with this rule. Continued compliance will be determined with subsequent inspections and reports.

## 2. Subpart DDDDD "Industrial, Commercial, and Institutional Boilers and Process Heaters"

This rule applies to boilers and process heaters located at major sources of HAPs. The only such source at this facility is boiler B2 and B3.

Boiler B2 is a new boiler as it was constructed after June 4, 2010. It is a stoker type wood fuel-fired boiler with 18.45 million Btu per hour heat input. The emission from this boiler is controlled by a multicyclone (ID No. FA2) in series with an electrostatic precipitator (ID No. ESP1).

This boiler is subject to the emission limits specified in Table 1 to the Subpart DDDDD. On October 06, 2022, EPA published the final amendments to the Major Source Boiler MACT which remanded several numeric emission standards. Effective from December 5, 2022, three emission limits from new or existing boilers and process heaters have been reduced: HCl standards for new solid fuel units and new liquid fuel units and the PM standard for existing biomass fluidized bed boilers. However, A DC Circuit court decision in late 2024 sets aside EPA's 2022 rule to the extent that it defines sources constructed or reconstructed before August 24, 2020, as "new sources". With the DC Circuit ruling that post 2010 boilers can't be defined as new, Marsh Furniture believes the 2013 new source limits apply to the Marsh boiler (HCl limit would be 0.020 lb/MMBtu) and hence references to "until October 6, 2025" for the emission limits as the 63.7500 added a deadline for the emission limit" should not be added as of this renewal. Despite EPA's 2022 rule revisions, due to the DC Circuit Court decision, those changes do not apply to Boiler B2. NC DAQ has aligned with MFC's interpretation and will not include EPA's new deadlines or changed limits in the boiler's permit renewal.

For the initial compliance demonstration of the boiler, the permittee is required to submit the Notification of Compliance Status (NOCS) before the COB on the 60<sup>th</sup> day following the completion of all performance and compliance test. This was completed on July 31, 2019. From the most recent inspection, it was found that the facility runs in compliance with this rule. Continuous compliance is expected.

B3 is a natural gas-fired boiler with 8.4 million Btu per hour heat input. So, for the purpose of this rule B3 is defined as a new boiler. B3 is required to do an initial and subsequent biennial tune-up and submission of these summary reports. DAQ received a letter from MFC on February 23, 2023, stating that the initial startup of this boiler was on February 10, 2023, thus meeting the compliance requirements of the initial notification. The initial tune-up of this boiler shall be conducted no later than 25 months after the initial startup of the boiler. Thus, the boiler must be tuned-up by March 31, 2025. The facility is required to keep records of the tune-up, as specified in 40 CFR 63, Subpart DDDDD and in this permit condition. During the most recent inspection, the natural gas usage records were reviewed and appeared to be complete. At this time, the facility appears to be in compliance with this permit condition and continuous compliance is expected.

The specific conditions for MACT DDDDD in the existing permit do not follow the format of DAQ's other Title V permits; these conditions will be reformatted in the new permit. This formatting change

does not reflect a physical change at the facility and is not intended to affect MFC's compliance requirements.

### PSD

This facility is a major source for PSD due to VOC emissions. As a result of a PSD review (Title V permit 03238T15, issued January 28, 2002), an annual VOC emission limit and Best Available Control Technology ("BACT") limits were included in the permit. The facility is required to limit annual VOC emissions to less than 659.17 tons per consecutive 12-month period. BACT for this facility was determined to be limiting the VOC content of materials based on the type of application for those materials.

In order to demonstrate compliance, MFC keeps a record of material usage and VOC emissions for all PSD-subject activities. A summary report of the recordkeeping activities must be submitted twice per year.

Based on the most recent inspection report, MFC appears to be in compliance with this rule. Continued compliance will be determined with subsequent inspections and reports.

### 112(r)

This facility does not appear to store any material listed in 40 CFR 68.130 above its respective threshold. Therefore, this rule does not apply to this facility. In addition, this facility does not have any increased requirements under Section 112(r) of the Clean Air Act.

### CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g. pre-November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

MFC is currently permitted for multiple bag filters (ID No. BF1 through BF6, BF8 through 10) for its wood waste collection systems. From a CAM analysis submitted by the facility on August 28, 2006, it was found that the pre-controlled PTE for BF 1, 4, 5 and 6 did not exceed the threshold of 100 tpy, therefore CAM is not required for these bag filters. In order to assure compliance, MFC performs daily observations of the filters for any visible emissions. MFC must keep records of observations and submit summary reports twice per year.

The control devices BF 8,9 and 10 have not yet been installed. The current permit T27 requires at Section 2.1 B.3.d the following:

Per 64.6(e), the Permittee shall submit compliance assurance monitoring in the form of an administrative amendment that satisfies Parts 64.3 and 64.4, including the establishment of normal operating ranges of the control devices, within 180 days of startup of each or all control devices (**ID Nos. BF8, BF9, and BF10**). If the Permittee does not submit the monitoring or if DAQ disapproves the submittal, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0614.

In any case, the “establishment of normal operating ranges” serves no purpose in this particular CAM plan. The CAM plan requires to Permittee to determine the presence of visible emissions or not. The presence of visible of emissions is an excursion that triggers trigger an inspection, corrective action, and a reporting requirement. As this language serves no purpose in this particular CAM plan it will be removed from the revised permit. To avoid unnecessary future permit modifications, the CAM plan will be revised to include the CAM requirements for the bagfilters (ID Nos. BF8, BF9, and BF10).

As part of this renewal MFC evaluated the applicability of CAM to Boiler B2 (Wood fired Hurst 18.45 mmBTU/hr heat input). Review of the permitting data for the unit indicated the individual uncontrolled potential emissions from the boiler do not exceed 100 tpy. Thus, the source B2 is not subject to CAM.

This permit renewal does not change the facility’s CAM status. However, the specific conditions for CAM in the existing permit do not follow the format of DAQ’s other Title V permits; these conditions will be reformatted in the new permit. This formatting change does not reflect a physical change at the facility and is not intended to affect MFC’s compliance requirements. Continuous compliance expected.

## **7. Facility Wide Air Toxics**

Emission limits associated with 02D .1100 and 02Q .0711 have previously been removed from this permit as allowed by Session Law 2012-91<sup>1</sup>. Therefore, the permit does not contain a specific condition for these rules.

This permit renewal does not trigger a new review for emissions of toxic air pollutants.

The permit at Section 2.3 currently includes a permit shield for these rules, presumably as allowed by 02Q .0512(a). However, 02D .1100 and 02Q .0711 are state enforceable only rules and have not been incorporated into NC’s state implementation plan (SIP). Therefore, these rules do not meet the definition of an applicable requirement pursuant to 15A NCAC 02Q .0103 and hence are not considered applicable requirements under the 02Q .0500 rules and specifically, 02Q .0512. As such, a permit shield does not apply to these rules. Thus, the condition at Section 2.3 A will be removed from the revised permit.

## **8. Facility Emissions Review**

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<sup>1</sup> See application review for Title V permit 03238T21, issued April 7, 2015.

The facility-wide potential emissions have not changed because of this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the previous five years (2018 through 2022) reporting periods are provided in the header of this permit review.

## 9. Compliance Status

DAQ has reviewed the compliance status of MFC. During the most recent inspection, conducted on June 19, 2024, by Thomas Gray of WSRO, the facility appeared to be in compliance with all applicable requirements.

The facility's compliance history listed below was summarized by Gray Thomas emailed to Suraiya on 9/4/2024:

- March 18, 2025- Notice of Violation for failing to record secondary/voltages for the electrostatic precipitator (ESP1) controlling emissions from the Boiler (B2) during startup/shutdown events for a time period from July 24, 2024 to July 29, 2024 as required by permit condition 2.1.D.5.n.iv and 40 CFR 63 Subpart DDDDD. The cause and how facility rectified the issue was provided in the 2024CY annual 5D Report. No response was requested.
- September 26, 2022 - Notice of Deficiency for excessive downtime of the COMs monitor for Boiler B2 during 1Q of 2022. The facility stated that the downtime was due to a failing computer. To resolve the issue, the facility replaced the computer and installed a redundant data system to keep backup records of COMs data.
- June 28, 2022 - Notice of Violation for oxygen trim sensor on boiler B2 being set below minimum (7.69%) outlined in permit condition 2.1.D.5.j.ii. A response was received on July 22, 2022 indicating the facility had changed the setpoint based on a previous stack test but had not modified the permit. The violation was resolved and the setpoint was changed back to 7.70%.
- February 14, 2022 - Notice of Violation for inaccurately recording VOC emissions and submitting inaccurate Emission Inventories since at least 2015. This was a violation of Condition 2.2.A.1.b and General Condition 3.X of Air Permit 03238T25. The facility resubmitted Emission Inventories with revised emission data from 2015-2020 to WSRO on March 1, 2022.
- September 3, 2020 - Notice of Deficiency (NOD) for not documenting the monthly leak inspections of equipment used to transfer or apply coating for spray booths associated with the New Hanging Line No. 1 (NHL1S) from October of 2019 through July of 2020. While the leak inspections may have been conducted, the records were not maintained. By failing to document the monthly leak inspections, the facility was deficient in fulfilling the requirements of 40 CFR Part 63, Subpart JJ "National Emission Standards for Wood Furniture Manufacturing Operations," as referenced in Condition 2.2.C.1 of Air Quality Permit 03238T25.
- February 4, 2019 - Notice of Violation and Notice of Recommendation for Enforcement (NOV/NRE) for exceeding the 20% opacity limit when averaged over a six-minute period on August 7, 2018 and December 21, 2018. The facility had two exceedances of this opacity limit on August 7, 2018 and four exceedances of this opacity limit on December 21, 2018. These exceedances were reported in the semi-annual report and Annual Compliance Certification report, which were received by DAQ on January 30, 2019. These exceedances were violations of

2D .0521 “Control of Visible Emissions” as referenced in Condition 2.1.E.3 of air Quality Permit 02338T24. Based on information from the facility and the Raleigh Central Office, the NOV/NRE was rescinded on June 10, 2019. While the facility’s permit lists that the stoker-type wood fuel-fired boiler (B2) is subject to 2D .0521(d), the facility has a Continuous Opacity Monitoring System (COMS) on this source. Therefore, the facility should be subject to 2D .0521(g). The requirements for 2D .0521(g) were not exceeded.

- January 3, 2019 - Notice of Violation and Notice of Recommendation for Enforcement (NOV/NRE) for exceeding the 20% opacity limit when averaged over a six-minute period on December 3, 2018. The facility had three exceedances of this opacity limit. These exceedances were reported in an email from Bruce Braswell, Regulatory Compliance Manager, which was received by DAQ on December 12, 2018. These exceedances were violations of 2D .0521 “Control of Visible Emissions” as referenced in Condition 2.1.E.3 of Air Quality Permit 02338T24. Based on information from the facility and the Raleigh Central Office, the NOV/NRE was rescinded on June 10, 2019. While the facility’s permit lists that the stoker-type wood fuel-fired boiler (B2) is subject to 2D .0521(d), the facility has a Continuous Opacity Monitoring System (COMS) on this source. Therefore, the facility should be subject to 2D .0521(g). The requirements for 2D .0521(g) were not exceeded.

The facility’s Annual Compliance Certification was received on January 30, 2024 and indicated compliance with all applicable requirements in 2023.

## **10. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .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 02Q .0521 above. The current NC permitting policy is to provide notice to all local programs in NC and all contiguous states regardless of their status as an affected state under 02Q .0522.

## **11. Other Regulatory Considerations**

### Fees

A permit fee is not required for this renewal application.

### PE Seal

Pursuant to 15A NCAC 02Q .0112 “Application requiring a Professional Engineering Seal,” specifically 02Q .0112(a), a professional engineer’s seal (PE Seal) is required to seal technical portions

of air permit applications for new sources and modifications of existing sources as defined in 15A NCAC 02Q .0103 that involve:

- (1) design;
- (2) determination of applicability and appropriateness; or
- (3) determination and interpretation of performance of air pollution capture and control systems.

As the renewal does not involve these criteria a PE seal is not required.

#### Zoning

A zoning consistency determination is required pursuant to 15A NCAC 02Q .0304(b) if the air permit application involves a new facility or the expansion of an existing facility.

As the renewal does not involve these criteria a zoning consistency determination is not required.

#### PFAS

To undertake any future standards-setting for PFAS emissions, the DEQ is currently collecting information on PFAS uses, creation (product or byproduct), and its environmental releases through a set of screening questions from some air quality permit applicants. As shown in the application chronology in section 3 above, the DEQ sent a set of PFAS screening questions to MFC. The facility replied with “no” to all PFAS screening questions (See Attachment 1). Thus, DAQ has decided not to further investigate the PFAS issue for this facility.

### **12. Recommendations**

The permit renewal application for Marsh Furniture Company, located in High Point, Guilford County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 03238T28.

## **Attachment 1**

### **Marsh Furniture Company's Response to DAQ PFAS Questionnaire**



