

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

Facility Identification Data

Name: HARDEN FURNITURE INC
Address: 1 MILL POND WAY
City: MCCONNELLSVILLE
Zip: 13401

Owner/Firm

Name: HARDEN FURNITURE INC
City: MCCONNELLSVILLE
State: NY Country: USA Zip: 13401
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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317 WASHINGTON ST
Phone:3157852245

Division of Air Resources:
Name: MATTHEW J POLGE
Phone:3157852513

Air Permitting Facility Owner Contact:
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Address: HARDEN FURNITURE INC
MILL POND WAY
Phone:3152451000

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

INITIAL TITLE V PERMIT FOR EXISTING FURNITURE MANUFACTURING FACILITY.

Attainment Status

HARDEN FURNITURE INC is located in the town of ANNSVILLE in the county of ONEIDA.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (NON-
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

EXISTING HARDWOOD FURNITURE MANUFACTURING FACILITY, INCLUDING SAW MILL, WOOD DRYING KILNS, WOOD FIRED BOILERS, WOODWORKING, ASSEMBLY, FINISHING AND UPHOLSTERY OPERATIONS. FINISHING INCLUDES STAINING, WIPING AND SPRAYING LACQUER AND SEALERS.

Permit Structure and Description of Operations

The Title V permit for HARDEN FURNITURE INC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

HARDEN FURNITURE INC is defined by the following emission unit(s):

Emission unit 0FINIS - WOOD FURNITURE FINISHING OPERATIONS. REFER TO EMISSION SOURCES - SCHEMATIC, SHEET 20f2, FOR MORE INFORMATION. THE MOVING FINISHING LINE CONSISTS OF A SERIES OF SPRAY BOOTHS AND DRYING OVENS. VARIOUS STAINS, WASHCOATS, GLAZES, AND LACQUERS ARE APPLIED AND DRIED IN AN ASSEMBLY LINE-LIKE OPERATION. FINISHED FURNITURE WITH MINOR DEFECTS IN THE FINISH ARE REPAIRED AND TOUCHED UP IN THE REPAIR BOOTH. FINISHED FURNITURE WITH MAJOR DEFECTS IN THE FINISH ARE STRIPPED IN THE WASHOFF BOOTH AND RETURNED TO THE FINISHING LINE. SPECIALTY FINISHES ARE APPLIED IN THE SPECIAL WORK BOOTH. LARGE PIECES OF FURNITURE ARE REMOVED FROM THE MOVING FINISHING LINE AT VARIOUS STAGES AND MOVED TO THE LARGE PIECE SPRAY BOOTHS FOR APPLICATION OF VARIOUS COATINGS, THEN RETURNED TO THE FINISHING LINE OR COMPLETED.

Emission unit 0FINIS is associated with the following emission points (EP):

00022, 02401, 02402, 02403, 02404, 02411, 02412, 02421, 02422, 02431, 02432, 02441, 02442, 02443, 02444, 02451, 02452, 02461, 02471, 02481, 02491, 02492, 24111

It is further defined by the following process(es):

Process: FC1 is located at FIRST, Building 24 - VARIOUS STAINS, WASHCOATS, GLAZES, SEALERS, AND LACQUERS ARE APPLIED AND DRIED IN A SERIES OF SPRAY BOOTHS AND DRYING OVENS IN AN ASSEMBLY LINE-LIKE OPERATION. REFER EMISSION SOURCES - SCHEMATIC, SHEET 2 OF 2, FOR MORE INFORMATION. FINISHED FURNITURE WITH MINOR DEFECTS IN THE FINISH ARE TOUCHED-UP IN THE REPAIR BOOTH

Process: FL1 is located at FIRST, Building 24 - Large pieces of furniture are removed from the moving finishing line at various stages and moved to the large piece spray booths (proposed) to facilitate application of various coatings. The pieces are either returned to the moving finishing line or completed. The operation of this process is limited to a maximum of 5840 hours per year.

Process: FS1 is located at FIRST, Building 24 - SPECIALTY FINISHES, SUCH AS UNIQUE COLORS, ARE APPLIED IN A SPRAY BOOTH.

Process: FW1 is located at FIRST, Building 24 - IF FINISH OF FINAL PRODUCT IS FLAWED, THE FINISH IS STRIPPED FROM THE PIECE AND IT IS RETURNED TO THE FRONT OF THE COATING LINE.

Emission unit 0POWER - Combustion of wood fuel generated from the sawmill and woodworking are used to produce steam. Emissions from the three boilers are controlled by two zurn multiclones in series. Maximum heat input from Boiler #1 is 14.6 mmbtu/hr. Maximum heat input of Boiler #2 is 41.54 mmbtu/hr. Maximum heat input of Boiler #3 is 27.6 mmbtu/hr.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

Emission unit OPOWER is associated with the following emission points (EP):
00015, 00016, 00600

It is further defined by the following process(es):

Process: BW1 is located at FIRST, Building 15 - COMBUSTION OF WOOD FUEL GENERATED FROM SAWMILL AND WOODWORKING TO PRODUCE STEAM. EMISSIONS ARE CONTROLLED BY TWO ZURN MULTICLONES IN SERIES. MAXIMUM HEAT INPUT IS 14.6 MMBTU/HR. BOILER NO. 1.

Process: BW2 is located at first, Building 15 - Combustion of wood fuel generated from sawmill and woodworking to produce steam. Emissions are controlled by two Zurn Multiclones in series. Maximum heat input is 41.54 MMBTU/hr. Boiler #2.

Process: BW3 is located at Building 15 - A scrap wood/bark fired with a maximum heat rating of 27.6 mmbtu/hour.

Title V/Major Source Status

HARDEN FURNITURE INC is subject to Title V requirements. This determination is based on the following information:

This facility is subject to Title V because its emissions of oxides of nitrogen are above major source thresholds.

Program Applicability

The following chart summarizes the applicability of HARDEN FURNITURE INC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

SIP

YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061

08/15/2003



SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2511	WOOD HOUSEHOLD FURNITURE
2512	UPHOLSTERED HOUSEHOLD FURNITURE
2521	WOOD OFFICE FURNITURE

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-03-009-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - WOOD/BARK WASTE Wood/Bark Fired Boiler
6-82-400-30	MACT MISCELLANEOUS PROCESSES PAINT STRIPPER USERS - CHEMICAL STRIPPERS APPLICATION, DEGRADATION, AND COATING REMOVAL STEPS
4-02-019-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - WOOD FURNITURE SURFACE COATING Coating Operation

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 6-3020-00024/00061

08/15/2003

chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER (HAP)	1	
000107-21-1	1,2-ETHANEDIOL (HAP)	92	
052299-20-4	1-PROPANOL, 2- ((HYDROXYMETHYL) AMINO) -2-METHYL C5H13NO2	> 0	but < 2.5 tpy
005131-66-8	2 - PROPANOL BUTOXY	> 0	but < 2.5 tpy
000111-77-3	2- (2-METHOXYETHOXY) -ETHANOL (HAP)	2	
034375-28-5	2- (HYDROXYMETHYLAMINO) ETHANOL C3HGNO2	> 0	but < 2.5 tpy
000096-29-7	2-BUTANONE, OXIME	> 0	but < 2.5 tpy
000108-01-0	2-DIMETHYL AMINO ETHANOL	> 0	but < 2.5 tpy
000110-43-0	2-HEPATANONE	>= 10	tpy but < 25 tpy
000110-12-3	2-HEXANONE, 5-METHYL	> 0	but < 2.5 tpy
000108-10-1	2-PENTANONE, 4-METHYL (HAP)	4003	
000107-98-2	2-PROPANOL, 1-METHOXY	> 0	but < 2.5 tpy
000108-65-6	2-PROPANOL, 1-METHOXY-, ACETATE	>= 2.5	tpy but < 10 tpy
002807-30-9	2-PROPOXY ETHANOL (HAP)	2877	
000108-83-8	4-HEPTANONE, 2,6-DIMETHYL-C9H18O	> 0	but < 2.5 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)	0.002	
000109-60-4	ACETIC ACID PROPYL ESTER	> 0	but < 2.5 tpy
000631-61-8	ACETIC ACID, AMMONIUM SALT	>= 2.5	tpy but < 10 tpy
007664-41-7	AMMONIA	> 0	but < 2.5 tpy
007631-86-9	AMORPHOUS SILICA (HAP)	> 0	but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	46	
000095-63-6	BENZENE, 1,2,4-TRIMETHYL-BUTANOL	> 0	but < 2.5 tpy
000071-36-3	BUTYL BENZYL PHTHALATE	>= 2.5	tpy but < 10 tpy
000085-68-7	BUTYL BENZYL PHTHALATE	> 0	but < 2.5 tpy
007440-44-0	CARBON	> 0	but < 2.5 tpy
000630-08-0	CARBON MONOXIDE	>= 250	tpy

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061

08/15/2003



009004-70-0	CELLULOSE NITRATE	>= 10 tpy but < 25 tpy
007440-47-3	CHROMIUM (HAP)	85
007440-48-4	COBALT (HAP)	1
007440-50-8	COPPER	> 0 but < 2.5 tpy
002528-36-1	DIBUTHYL PHENYL PHOSPHATE	> 0 but < 2.5 tpy
000075-09-2	DICHLOROMETHANE (HAP)	2257
000067-64-1	DIMETHYL KETONE	> 0 but < 2.5 tpy
026472-00-4	DIMETHYLDICLOPENTADIENE	> 0 but < 2.5 tpy
000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY) (HAP)	357
000112-34-5	ETHANOL, 2- (2-BUTOXYETHOXY) - (HAP)	481
000111-46-6	ETHANOL, 2, 2'-OXYBIS-	> 0 but < 10 tpy
000111-76-2	ETHANOL, 2-BUTOXY- (HAP)	3296
000141-78-6	ETHYL ACETATE	> 0 but < 2.5 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	>= 2.5 tpy but < 10 tpy
000100-41-4	ETHYLBENZENE (HAP)	2027
000050-00-0	FORMALDEHYDE (HAP)	19
008006-61-9	GASOLINE	> 0 but < 2.5 tpy
0NY100-00-0	HAP	49725
000110-19-0	ISOBUTYL ACETATE	>= 50 tpy but < 100 tpy
000078-83-1	ISOBUTYL ALCOHOL	>= 2.5 tpy but < 10 tpy
000108-21-4	ISOPROPYL ACETATE	> 0 but < 2.5 tpy
000067-63-0	ISOPROPYL ALCOHOL	>= 40 tpy but < 50 tpy
008008-20-6	KEROSENE	> 0 but < 2.5 tpy
007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)	1
001317-35-7	MANGANESE OXIDE (HAP)	> 0 but < 10 tpy
005280-66-0	MANGANESE, NAPHTHENCARBOXYLIC ACID COMPLEX	> 0 but < 2.5 tpy
012427-38-2	MANGANESE, ((1,2-ETHANEDIYLBIS(CARBAMODITHIOATO)) 2-) -	> 0 but < 2.5 tpy
000067-56-1	METHYL ALCOHOL (HAP)	8871
000078-93-3	METHYL ETHYL KETONE (HAP)	12489
064742-94-5	NAPHTHA HEAVY AROMATIC	> 0 but < 2.5 tpy
064742-88-7	NAPHTHA, MEDIUM ALIPHATIC	> 0 but < 2.5 tpy
008030-30-6	NAPHTHA	> 0 but < 2.5 tpy
064742-48-9	NAPHTHA HEAVY HYDROTREATED (PETROLEUM)	> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 100 tpy but < 250 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy
064741-88-4	PETROLEUM	> 0 but < 2.5 tpy
007664-38-2	DISTILLATES (HEAVY, PARAFFINIC)	> 0 but < 2.5 tpy
0NY075-00-5	PHOSPHORIC ACID	> 0 but < 2.5 tpy
000075-56-9	PM-10	>= 250 tpy
000097-85-8	PROPANE, 1,2-EPOXY- (HAP)	9
000763-69-9	PROPANOIC ACID, 2-METHYL-, 2-METHYLPROPYL ESTER	>= 10 tpy but < 25 tpy
014808-60-7	PROPANOIC ACID, 3-ETHOXY-, ETHYL ESTER	>= 2.5 tpy but < 10 tpy
064742-89-8	QUARTZ (HAP)	> 0 but < 10 tpy
008052-41-3	SOLVENT NAPHTHA (PETROLEUM), LIGHT ALIPH	> 0 but < 2.5 tpy
007446-09-5	STODDARD SOLVENT	>= 40 tpy but < 50 tpy
000108-88-3	SULFUR DIOXIDE	>= 2.5 tpy but < 10 tpy
0NY998-00-0	TOLUENE (HAP)	8509
001330-20-7	VOC	>= 250 tpy
000557-05-1	XYLENE, M, O & P MIXT. (HAP)	9896
	ZINC STEARATE	> 0 but < 2.5 tpy

Regulatory Analysis

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 6-3020-00024/00061

08/15/2003

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
0-POWER/00600	40CFR 60-Dc.40c	Steam generators 10-100 million Btu per hour	74
0-POWER/00600	40CFR 60-Dc.48c(a)	Reporting and Recordkeeping Requirements.	75
0-POWER/00600	40CFR 60-Dc.48c(g)	Reporting and Recordkeeping Requirements.	76
0-POWER/00600	40CFR 60-Dc.48c(i)	Reporting and Recordkeeping Requirements.	77
FACILITY	40CFR 63-A.1(b)(3)	Subpart A Applicability	37
FACILITY	40CFR 63-A.10(b)(3)		38
FACILITY	40CFR 63-JJ.800(a)		39, 40
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	41
FACILITY	6NYCRR 200.1	Definitions.	1
FACILITY	6NYCRR 200.5	Sealing.	2
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	3
FACILITY	6NYCRR 200.7	Maintenance of equipment.	4
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	10
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	5
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	6
FACILITY	6NYCRR 201-1.5	Emergency defense	7
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	8
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	9
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	11
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	12
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	78
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	79
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 42, 43
FACILITY	6NYCRR 201-6.5(c)(3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	26
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	27

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061

08/15/2003



FACILITY	6NYCRR 202-1.1	Required emissions tests.	28
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	29
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	30
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	80
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	31
0-FINIS	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	45, 46, 47
0-FINIS	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	48, 49
0-FINIS	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	50
0-FINIS	6NYCRR 212.7 (1)	Exemptions	51
FACILITY	6NYCRR 215.	Open Fires	32
0-POWER/00015	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	71
0-POWER/00016	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	72
0-POWER/00600	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	73
0-POWER	6NYCRR 227-2.4 (d)	RACT for Oxides of Nitrogen - small boilers.	70
0-FINIS	6NYCRR 228.1 (a)	Applicability and compliance.	52
FACILITY	6NYCRR 228.1 (d) (3)	Upstate - tables 1 and 2 applicability	33
FACILITY	6NYCRR 228.1 (d) (4)	Upstate constructed after 3/1/93	34
FACILITY	6NYCRR 228.1 (g)	"once in always in"	35
0-FINIS	6NYCRR 228.1 (h)	exemptions	53
FACILITY	6NYCRR 228.10	No open containers	36
0-FINIS	6NYCRR 228.2	Definitions.	54
0-FINIS	6NYCRR 228.3 (a)	compliant coatings or controls	55
0-FINIS	6NYCRR 228.3 (d) (7)	noncompliance reporting	56
0-FINIS	6NYCRR 228.4	Opacity.	57
0-FINIS	6NYCRR 228.5 (a)	recordkeeping	58
0-FINIS	6NYCRR 228.5 (b)	EPA method 24	59
0-FINIS	6NYCRR 228.5 (c)	alternate analytical methods	60
0-FINIS	6NYCRR 228.5 (d)	coating samples	61
0-FINIS	6NYCRR 228.8	Table 2	62, 63, 64, 65, 66, 67
0-FINIS	6NYCRR 228.9	Products regulated.	68
FACILITY	6NYCRR 231-2.2 (d) (3)	Exemptions	44
0-FINIS/-/FL1	6NYCRR 231-2.2 (d) (3)	Exemptions	69

Applicability Discussion:

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 6-3020-00024/00061



08/15/2003

6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 6-3020-00024/00061



08/15/2003

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)(3)

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, HARDEN FURNITURE INC has been determined to be subject to the following regulations:

40CFR 60-Dc.40c

This regulation requires the source owner or operator to comply with the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

40CFR 60-Dc.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

40CFR 60-Dc.48c (g)

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061

08/15/2003



The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40CFR 60-Dc.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40CFR 63-A.1 (b) (3)

Determinations that a source is not subject to a relevant standard (for example because it is an area source and the rule only covers major sources) must be kept for 5 years.

40CFR 63-A.10 (b) (3)

Determinations that a source is not subject to a relevant standard (for example because it is an area source and the rule only covers major sources) must be kept for 5 years.

40CFR 63-JJ.800 (a)

This provision specifies whether the facility is subject to 40CFR63, Subpart JJ for Wood Furniture Manufacturing Operations. If the facility has any wood furniture manufacturing process and is at a plant site that is a major source of hazardous air pollutants, the facility is subject to this rule. However, if the facility's primary products are something other than wood furniture and uses a small amount of finishing material or adhesives in their wood furniture manufacturing, the facility can simply keep usage records proving their small solvent usage and can avoid the requirements of this rule.

6NYCRR 200 .1

This section contains a definition of terms referred to throughout New York's entire codes, rules and regulations.

6NYCRR 212 .4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .7 (l)

Emissions sources with surface coating operations subject to Part 228 or coatings exempt from Part 228 for emissions of VOC which are not given an A rating are not subject to Part 212.

6NYCRR 227-1.3 (a)

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061

08/15/2003



This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (d)

This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6NYCRR 228 .1 (a)

This reference requires coating lines, subject to this rule and described in Table 1 or 2, to include the method(s) which will be used to comply with this rule along with the permit application.

6NYCRR 228 .1 (d) (3)

This reference provides the applicability criteria and compliance schedule for coating lines at a facility which is located outside of the New York City metropolitan area and the Lower Orange County metropolitan area. A facility, with a coating line described in Table 1, which has an annual potential to emit 10 tons or greater of VOC is subject to this rule and the compliance schedule included in this subdivision. A facility, with a coating line described in Table 2, which has an annual potential to emit 50 tons or greater of VOC is subject to this rule and the compliance schedule included in this subdivision. All facilities subject to this subdivision should have been in compliance with this rule by June 1, 1995, upon startup if constructed after March 1, 1993, or be in compliance with a consent order or other method which is used to restrict the VOC emissions from a facility until the Department has determined that the facility is in compliance with this rule.

6NYCRR 228 .1 (d) (4)

Any facility subject to this subdivision which is constructed after March 1, 1993 must demonstrate compliance with this rule upon startup.

6NYCRR 228 .1 (g)

This reference states that a facility subject to this rule will always be subject to this rule even if the VOC emissions are reduced below the applicability levels.

6NYCRR 228 .1 (h)

This reference provides a list of surface coating methods which are exempted from the requirements of this rule.

6NYCRR 228 .10

The requirements for handling, storage, and disposal of VOCs are provided in this section.

6NYCRR 228 .2

This reference provides definitions for the important terms used in this rule.

6NYCRR 228 .3 (a)

This reference provides the three options that can be used to control VOC emissions from a surface coating process. The three options are to use a compliant coating (i.e., one that does not exceed the allowable VOC content), the use of a coating system, or the use of air pollution control equipment.

New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

6NYCRR 228 .3 (d) (7)

The use of any noncompliant coating, used in a coating system, must be reported to the Department within 30 days.

6NYCRR 228 .4

This reference requires the opacity of the emissions from a facility, with surface coating processes subject to this rule, to be less than 20 % during any consecutive six minute period. Opacity limits are used primarily to control the quantity of particulates released from a source.

6NYCRR 228 .5 (a)

This reference provides the recordkeeping requirements for emission sources subject to this rule. All of these records must be kept for at least five years and provided to the Department upon request.

6NYCRR 228 .5 (b)

The analytical methods in 40 CFR 60, Appendix A, Method 24 must be used to determine the volatile content, water content, density, volume of solids, and weight of solids of the surface coatings

6NYCRR 228 .5 (c)

This reference allows the use of alternative analytical methods for determining the volatile content, water content, density, volume of solids, and weight of solids of the surface coatings, with the Department's approval, if the analytical methods in 40 CFR 60, Appendix A, Method 24 are not appropriate.

6NYCRR 228 .5 (d)

This reference requires facilities to allow Department staff to enter the facility in order to take coating samples during reasonable business hours.

6NYCRR 228 .8

Table 2 provides a list of surface coating processes and the corresponding allowable VOC content of the coating used in each process.

6NYCRR 228 .9

The Department will specify the appropriate VOC content limit for coatings which are used in processes not listed in Table 1 or 2.

6NYCRR 231-2.2 (d) (3)

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. The specific applicability exemptions to Subpart 231-2 are set forth in subsection (d).

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061



08/15/2003

Compliance Certification

Summary of monitoring activities at HARDEN FURNITURE INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
0-POWER/00600	record keeping/maintenance procedures	75
0-POWER/00600	record keeping/maintenance procedures	76
FACILITY	record keeping/maintenance procedures	37
FACILITY	record keeping/maintenance procedures	38
FACILITY	work practice involving specific operations	39
FACILITY	work practice involving specific operations	40
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	29
0-FINIS	record keeping/maintenance procedures	45
0-FINIS	monitoring of process or control device parameters as surrogate	46
0-FINIS	monitoring of process or control device parameters as surrogate	47
0-FINIS	intermittent emission testing	48
0-FINIS	intermittent emission testing	49
0-FINIS	intermittent emission testing	50
0-FINIS	record keeping/maintenance procedures	51
0-POWER/00015	monitoring of process or control device parameters as surrogate	71
0-POWER/00016	monitoring of process or control device parameters as surrogate	72
0-POWER/00600	monitoring of process or control device parameters as surrogate	73
0-POWER	record keeping/maintenance procedures	70
FACILITY	record keeping/maintenance procedures	33
0-FINIS	record keeping/maintenance procedures	53
0-FINIS	record keeping/maintenance procedures	54
0-FINIS	monitoring of process or control device parameters as surrogate	57
0-FINIS	work practice involving specific operations	62
0-FINIS	work practice involving specific operations	63
0-FINIS	work practice involving specific operations	64
0-FINIS	work practice involving specific operations	65
0-FINIS	work practice involving specific operations	66
0-FINIS	work practice involving specific operations	67
0-FINIS/-/FL1	record keeping/maintenance procedures	69

Basis for Monitoring

See specific regulations for descriptions.