

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-3020-00024/00061 Renewal Number: 1



04/25/2007

Facility Identification Data

Name: HARDEN FURNITURE INC
Address: 8550 MILL POND WAY
MCCONNELLSVILLE, NY 13401

Owner/Firm

Name: HARDEN FURNITURE INC
Address: 8550 MILL POND WAY
MC CONNELLSVILLE, NY 13401, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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Air Permitting Facility Owner Contact:
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8550 MILL POND WAY
MC CONNELLSVILLE, NY 13401
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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

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This is a renewal of the Title V permit.

Attainment Status

HARDEN FURNITURE INC is located in the town of ANNSVILLE in the county of ONEIDA. 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-ATTAINMENT)
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,

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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. 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 25 - 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. 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 to facilitate application of various coatings. The pieces are then 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 - This process consists of the #2 Lacquer 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.

Emission unit 0POWER 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

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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 boiler with a maximum heat rating of 27.6 mmbtu/hour. Emissions are controlled with two cyclones in series.

Title V/Major Source Status

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

The facility is a major source of emissions for the following pollutants:

- Oxides of Nitrogen
- Particulates
- PM-10
- Volatile Organic Compounds (VOC)

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)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES

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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.

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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

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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)	10	
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)	5000	
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
000062-53-3	ANILINE (HAP)		
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	100	
000095-63-6	BENZENE, 1,2,4-TRIMETHYL-		> 0 but < 2.5 tpy
000071-36-3	BUTANOL		>= 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

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000630-08-0	CARBON MONOXIDE	>= 250 tpy
009004-70-0	CELLULOSE NITRATE	>= 10 tpy but < 25 tpy
007440-47-3	CHROMIUM (HAP)	5
007440-48-4	COBALT (HAP)	10
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-	1
000111-76-2	ETHANOL, 2-BUTOXY-	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)	60
008006-61-9	GASOLINE	> 0 but < 2.5 tpy
000100-00-0	HAP	49500
000110-54-3	HEXANE (HAP)	100
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)	400
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
000210-00-0	OXIDES OF NITROGEN	>= 100 tpy but < 250 tpy
000075-00-0	PARTICULATES	>= 250 tpy
064741-88-4	PETROLEUM DISTILLATES (HEAVY, PARAFFINIC)	> 0 but < 2.5 tpy
007664-38-2	PHOSPHORIC ACID	> 0 but < 2.5 tpy
000075-00-5	PM-10	>= 250 tpy
000075-56-9	PROPANE, 1,2-EPOXY- (HAP)	9
000097-85-8	PROPANOIC ACID, 2-METHYL-, 2-METHYLPROPYL ESTER	>= 10 tpy but < 25 tpy
000763-69-9	PROPANOIC ACID, 3-ETHOXY-, ETHYL ESTER	>= 2.5 tpy but < 10 tpy
014808-60-7	QUARTZ (HAP)	> 0 but < 10 tpy
064742-89-8	SOLVENT NAPHTHA, LIGHT ALIPHATIC	> 0 but < 2.5 tpy
008052-41-3	STODDARD SOLVENT	>= 40 tpy but < 50 tpy
007446-09-5	SULFUR DIOXIDE	>= 2.5 tpy but < 10 tpy
000108-88-3	TOLUENE (HAP)	8509
000998-00-0	VOC	>= 250 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	9896
000557-05-1	ZINC STEARATE	> 0 but < 2.5 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

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- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**

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All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department

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pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

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All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by 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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	74
0-POWER/-/BW3	40CFR 60-A.7 (a) (4)	Notification and Recordkeeping	69
0-POWER/-/BW3	40CFR 60-A.7 (b)	Notification and Recordkeeping	70
0-POWER/-/BW3	40CFR 60-Dc.48c (a)	Reporting and Recordkeeping Requirements.	71
0-POWER/-/BW3	40CFR 60-Dc.48c (g)	Reporting and Recordkeeping Requirements.	72
0-POWER/-/BW3	40CFR 60-Dc.48c (i)	Reporting and	73

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FACILITY	40CFR 63-JJ	Recordkeeping Requirements. Subpart JJ: NESHAP for Wood Furniture Operations	27, 28
0-POWER FACILITY	40CFR 64	COMPLIANCE ASSURANCE MONITORING	62
FACILITY	40CFR 68	Chemical accident prevention provisions	21
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10, 23
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	75
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-3.3(c)	Trivial Activities - list of trivial activities	24
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	25, 31, 32
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	15
FACILITY	6NYCRR 201-6.5(a)(7)	General conditions	
Fees 2 FACILITY	6NYCRR 201-6.5(a)(8)	General conditions	16
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d)(5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	18
FACILITY	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	26, 27, 28, 33
0-FINIS/-/FL1	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	58
0-FINIS/-/FS1/OLAC3	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	59
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8

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FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	76
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	20
0-FINIS	6NYCRR 212.2	Determination of environmental rating	34
0-FINIS	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	35, 36, 37
0-FINIS	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	38
0-FINIS	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	39
0-FINIS	6NYCRR 212.7 (1)	Exemptions	40
FACILITY	6NYCRR 215	Open Fires	9
0-POWER	6NYCRR 227-1.2 (a) (4)	Particulate Emissions Firing Soild Fuels.	60
0-POWER/-/BW1	6NYCRR 227-1.2 (a) (4)	Particulate Emissions Firing Soild Fuels.	63, 64
0-POWER/-/BW2	6NYCRR 227-1.2 (a) (4)	Particulate Emissions Firing Soild Fuels.	65, 66
0-POWER/-/BW3	6NYCRR 227-1.2 (a) (4)	Particulate Emissions Firing Soild Fuels.	67, 68
0-POWER	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	61
FACILITY	6NYCRR 227-2.4 (d)	RACT for Oxides of Nitrogen - small boilers.	29
0-FINIS	6NYCRR 228.1 (d)	Will remain subject	41
FACILITY	6NYCRR 228.1 (e) (13)	Low-use specalty-type operation	30
0-FINIS	6NYCRR 228.10	non-applicability Handling, storage and disposal of VOCs	57
0-FINIS	6NYCRR 228.2	Definitions	42
0-FINIS	6NYCRR 228.3 (a)	Recordkeeping, reports for VOCs	43
0-FINIS	6NYCRR 228.4	Opacity	44
0-FINIS	6NYCRR 228.5 (a)	VOC recordkeeping by the facility	45
0-FINIS	6NYCRR 228.5 (b)	Use of Methods 311 or 24.	46
0-FINIS	6NYCRR 228.5 (c)	Altnate sampling and analysis methods	47
0-FINIS	6NYCRR 228.5 (d)	Department Access to Obtain Samples	48
0-FINIS	6NYCRR 228.6 (b)	Prohibition of Specification	49
0-FINIS	6NYCRR 228.8	Table 2	50, 51, 52, 53, 54, 55, 56
0-FINIS/-/FL1	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	58
0-FINIS/-/FS1/OLAC3	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	59

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Applicability Discussion:

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

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

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 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable 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 201-1.7

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

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)



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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 201-6

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 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must

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also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding 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 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

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 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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

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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 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 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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-A.7 (a) (4)

This regulation requires the facility to notify the Department of any changes being made to the boiler that may cause an increase in emissions or the emission of unpermitted pollutants.

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40CFR 60-A.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

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)

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-JJ

Subpart JJ applies to wood furniture manufacturing operations at facilities that are major sources of HAPs. The subpart includes emission limits for the following operations:

1. wood finishing material (coatings)
2. use of contact adhesives
3. use of strippable spray booth coatings

40CFR 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air

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Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6NYCRR 201-3.3 (c)

This section list the specific activities which are defined as trivial.

6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 212 .2

This regulation set forth the requirement to issue an environmental rating for specific pollutants emitted from the facility.

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)

This regulation exempts the voc emissions that are regulated under 6 NYCRR part 228, except those that are issued an "A" rating. Formaldehyde was issued an "A" rating and is subject to the requirement of 212. See the body of the permit.

6NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6NYCRR 227-1.3 (a)

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.

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6NYCRR 228 .1 (d)

This citation states that any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228, will remain subject to these provisions even if the annual potential to emit volatile organic compounds for the facility later falls below the thresholds set forth in this regulation.

6NYCRR 228 .1 (e) (13)

Any low use specialty coatings used in a quantity less than 55 gallons per year, facility wide, are exempt from the provisions of Part 228. These must be tracked and the facility must show usage is below the 55 gallon threshold.

6NYCRR 228 .10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .2

This citation specifies the formula used to calculate the maximum permitted pounds of volatile organic compound per gallon of coating specified in tables 1 and 2 of 6 NYCRR Part 228.

6NYCRR 228 .3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228, to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.



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6NYCRR 228 .5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6NYCRR 228 .5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6NYCRR 228 .6 (b)

This requires any person selling a coating for use in a coating line subject to Part 228 to, upon request, provide the user with certification of the VOC content of the coating supplied.

6NYCRR 228 .8

Table 2 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 231-2

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 addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification

Summary of monitoring activities at HARDEN FURNITURE INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
0-POWER/-/BW3	record keeping/maintenance procedures	69
0-POWER/-/BW3	record keeping/maintenance procedures	71
0-POWER/-/BW3	record keeping/maintenance procedures	72
0-POWER/-/BW3	record keeping/maintenance procedures	73
0-POWER	record keeping/maintenance procedures	62
FACILITY	record keeping/maintenance procedures	23
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	work practice involving specific operations	27
FACILITY	work practice involving specific operations	28
0-FINIS/-/FL1	work practice involving specific operations	58
0-FINIS/-/FS1/0LAC3	work practice involving specific operations	59
FACILITY	record keeping/maintenance procedures	7
0-FINIS	record keeping/maintenance procedures	34
0-FINIS	monitoring of process or control device	36



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	parameters as surrogate	
0-FINIS	monitoring of process or control device	37
	parameters as surrogate	
0-FINIS	record keeping/maintenance procedures	38
0-FINIS	record keeping/maintenance procedures	39
0-FINIS	record keeping/maintenance procedures	40
0-POWER	record keeping/maintenance procedures	60
0-POWER/-/BW1	monitoring of process or control device	63
	parameters as surrogate	
0-POWER/-/BW1	monitoring of process or control device	64
	parameters as surrogate	
0-POWER/-/BW2	monitoring of process or control device	65
	parameters as surrogate	
0-POWER/-/BW2	monitoring of process or control device	66
	parameters as surrogate	
0-POWER/-/BW3	monitoring of process or control device	67
	parameters as surrogate	
0-POWER/-/BW3	monitoring of process or control device	68
	parameters as surrogate	
0-POWER	monitoring of process or control device	61
	parameters as surrogate	
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	30
0-FINIS	record keeping/maintenance procedures	57
0-FINIS	record keeping/maintenance procedures	42
0-FINIS	record keeping/maintenance procedures	44
0-FINIS	record keeping/maintenance procedures	45
0-FINIS	record keeping/maintenance procedures	46
0-FINIS	record keeping/maintenance procedures	47
0-FINIS	record keeping/maintenance procedures	49
0-FINIS	record keeping/maintenance procedures	50
0-FINIS	work practice involving specific operations	51
0-FINIS	work practice involving specific operations	52
0-FINIS	work practice involving specific operations	53
0-FINIS	work practice involving specific operations	54
0-FINIS	work practice involving specific operations	55
0-FINIS	work practice involving specific operations	56

Basis for Monitoring

Condition #5 201-6.5(c)(3)(ii)- This regulations set forth the reporting requirements for the monitoring requirements of the permit. Any monitoring requirements shall be reported no less than semiannually.

Condition #6 201-6.5(e)- The facility must submit compliance certifications for each condition of the permit stating whether they were in compliance, out of compliance or had intermittent compliance during the one year reporting period.

Condition #7 202-2.1- The facility must submit an emission statement annually to show what it's actual emissions were for the reporting period.

Condition #23 200.7- The control devices utilized at this plant, including those that are on exempt and trivial sources, are required to operate according the the Department approved Operation, Maintenance and Monitoring plan.

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Condition #24 201-3.3(c)- In order to be considered trivial, the emissions from the sawmill and wood working operations are to be controlled. The facility utilizes baghouses which are required to operate according to the Department approved Operation, Maintenance and Monitoring Plan.

Condition #27 201-7.2- The facility has capped out of 40 CFR 63 subpart JJ for furniture manufacturers by limiting its potential to emit HAPs below 25 tons per year. The facility uses a system that tracks its usage of coatings and what HAPs are contained in those coatings. A monthly report can be generated to ensure compliance with the limit.

Condition #28 201-7.2- The facility has capped its emissions of each individual HAP in order to cap out of 40 CFR 63, subpart JJ.

Condition #29 227-2.4(d)- Because the facility is a potential major source of Oxides of Nitrogen, the boilers are required to have a tune up annually. A log is to be kept to track the who and when the tune ups were done.

Condition #30 228.1(e)(13)- Any low-use specialty coatings must be tracked to show the usage is below 55 gallons per year to qualify for the exemption. They can be tracked using the same system to track all the other coatings.

Condition #34 212.2- Because of the high toxicity of Formaldehyde and Chromium, the Department has issued an environmental rating of "A" so as to regulate them further under part 212.

Condition #36 212.4(a)- At the current level of emissions of Formaldehyde from the facility, additional air cleaning is not required. However, any changes will require departmental review before implemented in order to better document the emissions and possible impacts.

Condition #37 212.4(a)- At the current level of emissions of Chromium from the facility, additional air cleaning is not required. However, any changes will require departmental review before implemented in order to better document the emissions and possible impacts.

Condition #38 212.4(c)- All the spray booths on the finishing line employ particulate controls and are subject to the limit of 0.05 gr/dscm. Operation of the control devices according to the operation, maintenance and monitoring plan will control the emissions within the limit.

Condition #39 212.6(a)- All the spray booths on the finishing line employ particulate controls and are subject to the limit of 20% opacity. Operation of the control devices according to the operation, maintenance and monitoring plan will control the emissions within the limit.

Condition #40 212.7(i)- The VOC emissions that are subject to the requirements of part 228 which are NOT "A" rated, are exempt from the requirements of Part 212.

Condition #42 228.2- The VOC content of the coatings must be calculated to show compliance using the method in the regulation.

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Condition #44 228.4- All the spray booths on the finishing line employ particulate controls and are subject to the limit of 20% opacity. Operation of the control devices according to the operation, maintenance and monitoring plan will control the emissions within the limit.

Condition #45 228.5(a)- The facility must keep on record, the certification from the manufacturer of the VOC content of the coatings.

Condition #46 228.5(b)- The facility must use the required methods to determine the VOC content of the coatings upon request from the Department to determine compliance.

Condition #47 228.5(c)- If the listed sampling methods used to determine VOC content don't apply, then alternative methods can be used, pending approval from the department.

Condition #49 228.6(b)- The seller of the coating is required to provide a certification of the VOC content. This is there to ensure the facility understands this is required of the manufacturer.

Condition #50 228.8- The facility shall certify semiannually as to whether the coatings "as applied" were within the permit limits. Harden does not use added thinners in the coatings.

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Condition #57 228.10- A log of work area inspections is to be kept to determine if the "house keeping" is being done to minimize VOC emissions. These are daily inspections of the spray booth areas that are logged and reported to the Department semiannually.

Condition #58 201-7.2- The emissions from these sources were capped below 40 TPY so as to avoid New Source Review applicability. The material thruput from the affected sources will be tracked using the same system tracking the emissions plant wide.

Condition #59 201-7.2- The emissions from this spray booth were capped out of New Source Review

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by limiting emissions below 40 Tons Per Year. Since this booth only uses one type of coating, the facility has elected to track the hourly usage of the booth to determine emissions. This is tracked daily.

Condition #60 227-1.2(a)(4)- The facility is to conduct inspections of the control devices on the boilers in accordance with the CAM Plan. These inspections will be reported semiannually to ensure compliance.

Condition #61 227-1.3(a)- Once the boilers are up and running, there should be no visible emissions except for water vapor when they are operating properly. A daily visual check of the opacity will be done at the facility to check for any visible emissions. Visible emissions require a response in accordance with the provisions of the CAM Plan.

Condition #62 40 CFR 64- The CAM Plan covers the operation of the boilers with respect to the emission of Particulates. It outlines the daily visible checks of opacity, pressure drop across the cyclones and requires proper maintenance of the boilers and controls.

Condition #63 227-1.2(a)(4)- Because the design of the cyclones includes no moving parts, the pressure drop across the cyclones should not operate outside the establish range. Barring any catastrophic failure or clogs, it is mainly necessary just to check the the pressure drop occasionally to be sure they are working. The monitoring frequency on these will be twice per shift.

Condition #64 227-1.2(a)(4)- The particulate emission limit based on the equation for this boiler was determined to be 0.55 lbs per million BTUs of heat input.

Condition #65 227-1.2(a)(4)- Because the design of the cyclones includes no moving parts, the pressure drop across the cyclones should not operate outside the establish range. Barring any catastrophic failure or clogs, it is mainly necessary just to check the the pressure drop occasionally to be sure they are working. The monitoring frequency on these will be twice per shift.

Condition #66 227-1.2(a)(4)-The particulate emission limit based on the equation for this boiler was determined to be 0.44 lbs per million BTUs of heat input.

Condition #67 227-1.2(a)(4)- Because the design of the cyclones includes no moving parts, the pressure drop across the cyclones should not operate outside the establish range. Barring any catastrophic failure or clogs, it is mainly necessary just to check the the pressure drop occasionally to be sure they are working. The monitoring frequency on these will be twice per shift.

Condition #68 227-1.2(a)(4)- The particulate emission limit based on the equation for this boiler was determined to be 0.48 lbs per million BTUs of heat input.

Condition #69 40 CFR 60.7(a)(4)- Boiler 3 is a newer boiler and is subject to the requirement of 40 CFR 60 subpart Dc. A change in operation or design that changes emissions shall be subject to proper notification.

Condition #71 40 CFR 60.48c(a)- This outlines the proper notifications in the event of a construction or reconstruction.

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Condition #72 40 CFR 60.48c(g)- Daily records are taken to determine the fuel usage in the boiler.

Condition #73 40 CFR 60.48c(i)- This regulation requires records to be kept for 2 years. However, Title V requirements are for 5 year record retention, so that is what needs to be done.