



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

**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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UTICA, NY 13501

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Division of Air Resources:

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Air Permitting Facility Owner Contact:

Name: ANDREW CLARK

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MC CONNELLSVILLE, NY 13401

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**

This is a Title V Renewal #2.

**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**

**Renewal Number: 2**

**08/23/2012**

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*                                      | 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, 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 0POWER - The emission unit consists of the operation of three wood-fired boilers; most



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

wood fuel is produced onsite from the sawmill and other woodworking operations. PM emissions from each boiler is controlled by a set of two Zurn multiclones in series (six multiclones total). Maximum heat input of boilers: Boiler#1 = 14.6 MMbtu/hr, Boiler#2 = 41.54 MMbtu/hr, Boiler#3 = 27.6 MMbtu/hr. Harden is a major source due to NOx potential that exceeds 100 ton/yr.

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

00015, 00016, 00600

Process: BW1 is located at FIRST, Building 15 - This Process is the operation of Boiler #1. Wood fuel that is generated from sawmill and woodworking operations is combusted to produce steam. PM emissions are controlled by two Zurn multiclones in series. Maximum heat input is 14.6 MMbtu/hr. This boiler is NOT subject to 40 CFR 60 Subpart Dc, due to installation prior to 6/9/89.

Process: BW2 is located at first, Building 15 - This Process is the operation of Boiler #2. Wood fuel that is generated from the sawmill and woodworking operations is combusted to produce steam. PM emissions are controlled by two Zurn multiclones in series. Maximum heat input is 41.54 MMbtu/hr. This boiler is NOT subject to 40 CFR 60 Subpart Dc, due to installation prior to 6/9/89.

Process: BW3 is located at Building 15 - This process is the operation of Boiler #3. Scrap wood/bark is combusted to produce steam; the maximum heat input is 27.6 MMbtu/hour. PM emissions are controlled with two cyclones in series. This boiler commenced operation on 1/1/1999, which was later than the 40 CFR 60 Subpart Dc threshold date of 6/9/1989, so this unit is subject to Subpart Dc.

Process: ENG is located at 43, 17, creek, wtank - This process is the operation of emergency diesel engines; for either the generation of electricity or as water pumps for fire protection. These engines are exempt in Part 201-3, but subject to 40 CFR 63 Subpart ZZZZ.

Emission unit 0FINIS - This emission unit involves the surface coating (Part 228) of wood furniture. A moving finishing line consists of a series of spray booths and drying ovens. Various stains, wash coats, glazes, and lacquers are applied and dried in an assembly line operation.

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

Process: FC1 is located at FIRST, Building 25 - In this process, various stains, wash coats, glazes, sealers and lacquers are applied in spray booths and dried in drying ovens in an assembly line operation. Finished furniture with minor finish defects is touched up in the repair booth.

Process: FL1 is located at FIRST, Building 24 - In this process, large furniture pieces are removed from the moving finishing line at various stages and moved to the large piece spray booths to facilitate the application of various coatings. These pieces are then either returned to the moving finishing line or they are immediately completed. Without capping, FL1 would be subject to NSR.

Process: FS1 is located at FIRST, Building 24 - This process consists of the coating operations in the #2 Lacquer Booth. Without capping, FS1 would be subject to NSR.

Process: FW1 is located at FIRST, Building 24 - This process consists of the stripping of rejected finish. This process repairs flawed finishes.



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

**Title V/Major Source Status**

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

Harden is major for NOx and also for VOC Harden is not major for HAP, as they have capped this contaminant below the major source threshold.

**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           |
| 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



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

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.

**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  
2512  
2521

WOOD HOUSEHOLD FURNITURE  
UPHOLSTERED HOUSEHOLD FURNITURE  
WOOD OFFICE FURNITURE

**SCC Codes**



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

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 -<br>COMMERCIAL/INDUSTRIAL<br>COMMERCIAL/INSTITUTIONAL BOILER - WOOD/BARK<br>WASTE<br>Wood/Bark Fired Boiler      |
| 2-03-001-01 | INTERNAL COMBUSTION ENGINES -<br>COMMERCIAL/INSTITUTIONAL<br>COMMERCIAL/INSTITUTIONAL IC ENGINE -<br>DISTILLATE OIL (DIESEL)<br>Reciprocating |
| 4-02-019-01 | SURFACE COATING OPERATIONS<br>SURFACE COATING OPERATIONS - WOOD FURNITURE<br>SURFACE COATING<br>Coating Operation                             |
| 6-82-400-30 | MACT MISCELLANEOUS PROCESSES<br>PAINT STRIPPER USERS - CHEMICAL STRIPPERS<br>APPLICATION, DEGRADATION, AND COATING<br>REMOVAL STEPS           |

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every 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    | Range             |
|----------------------------|---|--------|-------------------|
|                            |   | lbs/yr |                   |
| 000084-74-2                | 1,2-<br>BENZENEDICARBOXYLIC<br>ACID, DIBUTYL ESTER      | 10     |                   |
| 000107-21-1<br>052299-20-4 | 1,2-ETHANEDIOL<br>1-PROPANOL, 2-<br>(HYDROXYMETHYL)AMIN | 92     | > 0 but < 2.5 tpy |

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



**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

|             |                        |       |                             |
|-------------|------------------------|-------|-----------------------------|
| 005131-66-8 | O)-2-METHYL C5H13NO2   |       | > 0 but < 2.5 tpy           |
| 000111-77-3 | 2 - PROPANOL BUTOXY    |       |                             |
|             | 2-(2-METHOXYETHOXY)-   | 2     |                             |
|             | ETHANOL                |       |                             |
| 034375-28-5 | 2-                     |       | > 0 but < 2.5 tpy           |
|             | (HYDROXYMETHYLAMINO    |       |                             |
|             | )ETHANOL C3HGNO2       |       |                             |
| 000096-29-7 | 2-BUTANONE, OXIME      |       | > 0 but < 2.5 tpy           |
| 000108-01-0 | 2-DIMETHYL AMINO       |       | > 0 but < 2.5 tpy           |
|             | ETHANOL                |       |                             |
| 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  | 4003  |                             |
| 000107-98-2 | 2-PROPANOL, 1-METHOXY  |       | > 0 but < 2.5 tpy           |
| 000108-65-6 | 2-PROPANOL, 1-METHOXY- |       | >= 2.5 tpy but < 10 tpy     |
|             | , ACETATE              |       |                             |
| 002807-30-9 | 2-PROPOXY ETHANOL      | 5000  |                             |
| 000108-83-8 | 4-HEPTANONE, 2,6-      |       | > 0 but < 2.5 tpy           |
|             | DIMETHYL- C9H18O       |       |                             |
| 000108-05-4 | ACETIC ACID ETHENYL    | 0.002 |                             |
|             | ESTER                  |       |                             |
| 000109-60-4 | ACETIC ACID PROPYL     |       | > 0 but < 2.5 tpy           |
|             | ESTER                  |       |                             |
| 000631-61-8 | ACETIC ACID, AMMONIUM  |       | >= 2.5 tpy but < 10 tpy     |
|             | SALT                   |       |                             |
| 007664-41-7 | AMMONIA                |       | > 0 but < 2.5 tpy           |
| 007631-86-9 | AMORPHOUS SILICA       |       | > 0 but < 10 tpy            |
| 000062-53-3 | ANILINE                |       |                             |
| 000098-82-8 | BENZENE, (1-           | 100   |                             |
|             | METHYLETHYL)           |       |                             |
| 000095-63-6 | BENZENE, 1,2,4-        |       | > 0 but < 2.5 tpy           |
|             | TRIMETHYL-             |       |                             |
|             | BUTANOL                |       | >= 2.5 tpy but < 10 tpy     |
| 000071-36-3 | BUTYL BENZYL           |       | > 0 but < 2.5 tpy           |
| 000085-68-7 | PHTHALATE              |       |                             |
| 007440-44-0 | CARBON                 |       | > 0 but < 2.5 tpy           |
| 000124-38-9 | CARBON DIOXIDE         | 71488 |                             |
| 0NY750-00-0 | CARBON DIOXIDE         | 1639  |                             |
|             | EQUIVALENTS            |       |                             |
| 000630-08-0 | CARBON MONOXIDE        |       | >= 250 tpy but < 75,000 tpy |
| 009004-70-0 | CELLULOSE NITRATE      |       | >= 10 tpy but < 25 tpy      |
| 007440-47-3 | CHROMIUM               | 5     |                             |
| 007440-48-4 | COBALT                 | 10    |                             |
| 007440-50-8 | COPPER                 |       | > 0 but < 2.5 tpy           |
| 002528-36-1 | DIBUTHYL PHENYL        |       | > 0 but < 2.5 tpy           |
|             | PHOSPHATE              |       |                             |
| 000075-09-2 | DICHLOROMETHANE        | 2257  |                             |
| 000067-64-1 | DIMETHYL KETONE        |       | > 0 but < 2.5 tpy           |
| 026472-00-4 | DIMETHYLDICLOPENTADI   |       | > 0 but < 2.5 tpy           |
|             | ENE                    |       |                             |
| 000111-90-0 | ETHANOL, 2- (2-        | 357   |                             |
|             | ETHOXYETHOXY)          |       |                             |
| 000112-34-5 | ETHANOL, 2-(2-         | 481   |                             |
|             | BUTOXYETHOXY)-         |       |                             |
| 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          |       | >= 2.5 tpy but < 10 tpy     |
|             | (ETHANOL)              |       |                             |
| 000100-41-4 | ETHYLBENZENE           | 2027  |                             |
| 000050-00-0 | FORMALDEHYDE           | 60    |                             |
| 008006-61-9 | GASOLINE               |       | > 0 but < 2.5 tpy           |
| 0NY100-00-0 | HAP                    | 49500 |                             |
| 000110-54-3 | HEXANE                 | 100   |                             |

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



**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

|             |   |       |                             |
|-------------|---|-------|-----------------------------|
| 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  |       | > 0 but < 10 tpy            |
| 007439-96-5 | MANGANESE   | 1     |                             |
| 001317-35-7 | MANGANESE OXIDE   | 400   |                             |
| 005280-66-0 | MANGANESE,<br>NAPHLENECARBOXYLIC<br>ACID COMPLEX            |       | > 0 but < 2.5 tpy           |
| 012427-38-2 | MANGANESE,((1,2-<br>ETHANEDIYLBIS(CARBAM<br>ODITHIOATO))2)- |       | > 0 but < 2.5 tpy           |
| 000067-56-1 | METHYL ALCOHOL  | 8871  |                             |
| 000078-93-3 | METHYL ETHYL KETONE   | 12489 |                             |
| 064742-94-5 | NAPHTHA HEAVY<br>AROMATIC                                   |       | > 0 but < 2.5 tpy           |
| 064742-88-7 | NAPHTHA, MEDIUM<br>ALIPHATIC                                |       | > 0 but < 2.5 tpy           |
| 008030-30-6 | NAPHTHA   |       | > 0 but < 2.5 tpy           |
| 064742-48-9 | NAPHTHA HEAVY<br>HYDROTREATED<br>(PETROLEUM)                |       | > 0 but < 2.5 tpy           |
| 0NY210-00-0 | OXIDES OF NITROGEN  |       | >= 100 tpy but < 250 tpy    |
| 0NY075-00-0 | PARTICULATES  |       | >= 250 tpy but < 75,000 tpy |
| 064741-88-4 | PETROLEUM<br>DISTILLATES(HEAVY,PAR<br>AFFINIC)              |       | > 0 but < 2.5 tpy           |
| 007664-38-2 | PHOSPHORIC ACID   |       | > 0 but < 2.5 tpy           |
| 0NY075-00-5 | PM-10   |       | >= 250 tpy but < 75,000 tpy |
| 000075-56-9 | PROPANE, 1,2-EPOXY-   | 9     |                             |
| 000097-85-8 | PROPANOIC ACID, 2-<br>METHYL-, 2-<br>METHYLPROPYL ESTER     |       | >= 10 tpy but < 25 tpy      |
| 000763-69-9 | PROPANOIC ACID, 3-<br>ETHOXY-, ETHYL ESTER                  |       | >= 2.5 tpy but < 10 tpy     |
| 014808-60-7 | QUARTZ  |       | > 0 but < 10 tpy            |
| 064742-89-8 | SOLVENT NAPHTHA, LIGHT<br>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   | 8509  |                             |
| 0NY998-00-0 | VOC   |       | >= 250 tpy but < 75,000 tpy |
| 001330-20-7 | XYLENE, M, O & P MIXT.                                      | 9896  |                             |
| 000557-05-1 | ZINC STEARATE   |       | > 0 but < 2.5 tpy           |

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Emergency Defense - 6 NYCRR 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;

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



**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

(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 - 6 NYCRR 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 6 NYCRR 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.

**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 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.



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

**Item H: Property Rights - 6 NYCRR 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)**

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 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.

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



**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

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)**

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.

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



Permit ID: 6-3020-00024/00061

Renewal Number: 2

08/23/2012

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<br>Facility/EU/EP/Process/ES | Regulation               | Condition  | Short Description   |
|---------------------------------------|--------------------------|------------|---|
| --<br>FACILITY                        | ECL 19-0301              | 73         | Powers and Duties of the Department with respect to air pollution control                     |
| 0-POWER/-/BW3                         | 40CFR 60-A.7(a)(4)       | 70         | Notification and Recordkeeping  |
| 0-POWER/-/BW3                         | 40CFR 60-A.7(b)          | 71         | Notification and Recordkeeping  |
| FACILITY                              | 40CFR 60-Dc.48c(g)(2)    | 42         | Alternative recordkeeping   |
| 0-POWER/-/BW3                         | 40CFR 60-Dc.48c(i)       | 72         | Reporting and Recordkeeping Requirements.   |
| FACILITY                              | 40CFR 63-JJ              | 29, 30     | Subpart JJ: NESHAP for Wood Furniture Operations  |
| FACILITY                              | 40CFR 63-JJJJJJ.11223(b) | 43         | ICI Boiler Area Source NESHAP - Tune-up Procedures  |
| FACILITY                              | 40CFR 63-ZZZZ.Table(2)(  | 44         | Requirements for Existing Compression Ignition Stationary RICE Located at Area Sources of HAP |
| 0-POWER                               | 40CFR 64                 | 69         | Emissions COMPLIANCE ASSURANCE MONITORING   |
| FACILITY                              | 40CFR 64.7               | 45, 46, 47 | CAM - Operation of approved monitoring  |
| FACILITY                              | 40CFR 68                 | 20         | Chemical accident prevention provisions   |
| FACILITY                              | 40CFR 82-F               | 21         | Protection of Stratospheric Ozone - recycling and emissions reduction                         |
| FACILITY                              | 6NYCRR 200.6             | 1          | Acceptable ambient air quality.   |
| FACILITY                              | 6NYCRR 200.7             | 10, 22     | Maintenance of equipment.   |
| FACILITY                              | 6NYCRR 201-1.4           | 74         | Unavoidable noncompliance and violations  |
| FACILITY                              | 6NYCRR 201-1.7           | 11         | Recycling and Salvage   |
| FACILITY                              | 6NYCRR 201-1.8           | 12         | Prohibition of reintroduction of collected contaminants to the air                            |
| FACILITY                              | 6NYCRR 201-3.2(a)        | 13         | Exempt Activities -   |

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



**Permit ID: 6-3020-00024/00061**  
**Renewal Number: 2**  
**08/23/2012**

|          |                              |                           |  |
|----------|------------------------------|---------------------------|--|
| FACILITY | 6NYCRR 201-3.2(c)(6)         | 23                        | Proof of eligibility<br>Exempt Activities -<br>emergency power<br>generating units             |
| FACILITY | 6NYCRR 201-3.3(a)            | 14                        | Trivial Activities -<br>proof of eligibility   |
| FACILITY | 6NYCRR 201-3.3(c)            | 24, 25, 26                | Trivial Activities -<br>list of trivial<br>activities  |
| FACILITY | 6NYCRR 201-6                 | 27, 48, 49                | Title V Permits and<br>the Associated Permit<br>Conditions                                     |
| FACILITY | 6NYCRR 201-6.5(a)(4)         | 15                        | General conditions   |
| FACILITY | 6NYCRR 201-6.5(a)(7)         | 2                         | General conditions<br>Fees   |
| FACILITY | 6NYCRR 201-6.5(a)(8)         | 16                        | General conditions   |
| FACILITY | 6NYCRR 201-6.5(c)            | 3                         | Permit conditions for<br>Recordkeeping and<br>Reporting of<br>Compliance Monitoring            |
| FACILITY | 6NYCRR 201-6.5(c)(2)         | 4                         | Permit conditions for<br>Recordkeeping and<br>Reporting of<br>Compliance Monitoring            |
| FACILITY | 6NYCRR 201-<br>6.5(c)(3)(ii) | 5                         | Permit conditions for<br>Recordkeeping and<br>Reporting of<br>Compliance Monitoring            |
| FACILITY | 6NYCRR 201-6.5(d)(5)         | 17                        | Compliance schedules   |
| FACILITY | 6NYCRR 201-6.5(e)            | 6                         | Compliance<br>Certification  |
| FACILITY | 6NYCRR 201-6.5(f)(6)         | 18                        | Off Permit Changes   |
| FACILITY | 6NYCRR 201-7                 | 28, 29, 30, 31, 32,<br>50 | Federally Enforceable<br>Emissions Caps  |
| FACILITY | 6NYCRR 202-1.1               | 19                        | Required emissions<br>tests.   |
| FACILITY | 6NYCRR 202-2.1               | 7                         | Emission Statements -<br>Applicability   |
| FACILITY | 6NYCRR 202-2.5               | 8                         | Emission Statements -<br>record keeping<br>requirements.                                       |
| FACILITY | 6NYCRR 211.1                 | 33                        | General Prohibitions<br>- air pollution<br>prohibited  |
| FACILITY | 6NYCRR 211.2                 | 75, 76                    | General Prohibitions<br>- visible emissions<br>limited.  |
| 0-FINIS  | 6NYCRR 212.2                 | 51                        | Determination of<br>environmental rating   |
| 0-FINIS  | 6NYCRR 212.4(a)              | 52, 53                    | General Process<br>Emission Sources -<br>emissions from new<br>sources and/or<br>modifications |
| 0-FINIS  | 6NYCRR 212.7(1)              | 54                        | Exemptions   |
| FACILITY | 6NYCRR 215.2                 | 9                         | Open Fires -<br>Prohibitions   |
| FACILITY | 6NYCRR 226                   | 34                        | SOLVENT METAL<br>CLEANING PROCESSES  |
| FACILITY | 6NYCRR 226.2                 | 35                        | General Requirements   |
| FACILITY | 6NYCRR 227-1.2(a)(4)         | 36, 37, 38                | Particulate Emissions<br>Firing Solid Fuels.   |
| 0-POWER  | 6NYCRR 227-1.2(a)(4)         | 68                        | Particulate Emissions<br>Firing Solid Fuels.   |



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

|          |                         |                            |   |
|----------|-------------------------|----------------------------|---|
| FACILITY | 6NYCRR 227-1.3 (a)      | 39                         | Smoke Emission Limitations.   |
| 0-FINIS  | 6NYCRR 228-1.1 (d)      | 55                         | Will remain subject   |
| FACILITY | 6NYCRR 228-1.1 (e) (13) | 40                         | Low-use specialty-type operation non-applicability  |
| 0-FINIS  | 6NYCRR 228-1.10         | 67                         | Handling, storage and disposal of VOCs  |
| 0-FINIS  | 6NYCRR 228-1.2          | 56                         | Definitions   |
| 0-FINIS  | 6NYCRR 228-1.3 (a)      | 57                         | Recordkeeping, reports for VOCs   |
| FACILITY | 6NYCRR 228-1.4          | 41                         | Opacity   |
| 0-FINIS  | 6NYCRR 228-1.5 (b)      | 58                         | Use of Methods 311 or 24.   |
| 0-FINIS  | 6NYCRR 228-1.5 (d)      | 59                         | Department Access to Obtain Samples   |
| 0-FINIS  | 6NYCRR 228-1.8          | 60, 61, 62, 63, 64, 65, 66 | Table 2   |
| 0-FINIS  | 6NYCRR 228-2.3 (g)      | 77                         | Compliance with VOC content limits in Table 1 or by add-on air pollution control equipment.   |
| 0-FINIS  | 6NYCRR 228-2.3 (i)      | 78                         | No person shall solicit, require the use or specify the application of noncomplaint products. |
| 0-FINIS  | 6NYCRR 228-2.5 (a)      | 79                         | Recordkeeping requirements for 228-2.3  |
| FACILITY | 6NYCRR 231-1            | 31                         | Requirements for emission sources subject to the regulations prior to 11/15/92                |
| FACILITY | 6NYCRR 231-2            | 32                         | New Source Review in Nonattainment Areas and Ozone Transport Region                           |

**Applicability Discussion:**

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

ECL 19-0301

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.

6 NYCRR 200.6

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

6 NYCRR 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



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

6 NYCRR 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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

monitoring, as necessary.

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

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 202-2.1

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

6 NYCRR 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.



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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:

40 CFR 60.48c (g) (2)

This regulation allows the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

40 CFR 60.48c (i)

Subpart Dc requires harden to keep Dc related records for a minimum 5 year period.

40 CFR 60.7 (a) (4)

Because process BW3 is subject to Subpart Dc, Dc invokes Subpart A, the general requirements. Harden is required to inform the NYSDEC and the EPA of any boiler changes that are pertinent to this rule.

40 CFR 60.7 (b)

Per Subpart A (Subpart A is triggered by process BW3's applicability to Subpart Dc), harden is required



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

to maintain records of SSM or other malfunctions of control equipment. In this case the control equipment is the two cyclones that are connected to Boiler #3.

40 CFR 63.11223 (b)

Subpart JJJJJ requires Harden's three wood-fired boilers to have biennial tune ups. Harden is not major for HAPs, so Harden is an area source, for purposes of JJJJJ.

40 CFR 63.Table (2) (d)

Harden has four emergency RICE diesel engines that are each less than 500HP. Harden is required to maintain oil, oil filters, air filters, belts and hoses at various 500 and 1000 hour intervals.

40 CFR 64.7

This regulation (40 CFR 64.7) requires that Harden operate and monitor air pollution control devices that are involved by the CAM Plan.

40 CFR Part 63, Subpart JJ

This refers to 40 CFR 63-Subpart JJ, which is a wood-finishing MACT rule. Harden has capped HAPs below 10/25 tons/yr to avoid the applicability of this rule.

40 CFR Part 64

This condition states that a Compliance Assurance Monitoring (CAM) plan is required for the six Zurn multicyclones three wood-fired boilers. The CAM Plan is a guidebook on how the cyclones are to be serviced and monitored.

6 NYCRR 201-3.2 (c) (6)

This condition makes clear that 4 emergency diesel engines (2 gensets and 2 fire pumps) are exempt from permitting. However, they all are subject to 40 CFR 63 Subpart ZZZZ.

6 NYCRR 201-3.3 (c)

This condition defines any sources at Harden that are "trivial".

6 NYCRR 211.1

This is a required regulation; it mandates that Harden may not impede the life/health of others via air pollution.

6 NYCRR 212.2

This condition states that chromium and formaldehyde, which are A-rated HAPs (high toxicity) are not exempt from Part 212.

6 NYCRR 212.4 (a)



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

This emission limitation is dictated by 6 NYCRR 212.9(a) Table #2. Per Table 2, when formaldehyde (A-rated HAP) emissions reach or exceed 1 lb/hr in emission unit 0-FINIS, then facility shall install control.

This 0.9 lb/hr limit has been placed to avoid such a requirement to add control. This emission unit will not require any degree of air cleaning for the contaminant formaldehyde under the operating conditions as stated by the applicant (<1 lb/hr).

6 NYCRR 212.7 (l)

For coating operations that exclude any A-rated HAP and that are either permitted or exempt: If covered by Part 228, then they shall not be again covered by Part 212.

6 NYCRR 226.2

This condition has been placed into this permit because I wanted to make clear that the degreaser was trivial and not exempt, and technically why. I also want Harden to calculate VOC emissions that come from degreasing solvent evaporation.

6 NYCRR 227-1.2 (a) (4)

These three conditions require that Harden stack test the three boilers once per the term of each Title V Permit and that the PM grain-loading conform to the equation that is associated with Table 1 in 6 NYCRR 227-1.2(a)(4).

6 NYCRR 227-1.3 (a)

This regulation sets the opacity limit at 20% for each boiler stack.

6 NYCRR 228-1.1 (d)

This condition makes clear that Harden is subject to "once in, always in" applicability to Part 228. Harden is limited in the extent to which they can remove themselves from Part 228.

6 NYCRR 228-1.1 (e) (13)

Low or occasional usage coatings may be exempt from Part 228, but good recordkeeping is required.

6 NYCRR 228-1.10

This condition requires daily paint shop inspections for open coating/solvent containers, unsecured solvent-laden rags and other unnecessary evaporation of solvents. Records of these inspections are required.

6 NYCRR 228-1.2

This condition specifies that Harden must use a very specific equation to calculate "lbs of VOC per gallon of coating less water and exempt VOC". The EPA wants to make sure that VOC-content is evaluated in a consistent manner.



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

6 NYCRR 228-1.3 (a)

This condition was placed to make clear that Harden must utilize as-applied coatings that are in accord with Tables 1 and 2 of Part 228.

6 NYCRR 228-1.4

This condition sets an opacity limit of 20% on the stacks that exhaust the paint booths. It requires weekly monitoring as well.

6 NYCRR 228-1.5 (b)

This condition makes clear that various coating parameters will be determined by EPA Reference Methods 24 or 311. The EPA wants conformity in the evaluation of coatings.

6 NYCRR 228-1.5 (d)

This condition reserves the NYSDEC's right to enter Harden for the purpose of obtaining samples of coatings.

6 NYCRR 228-1.8

This condition requires Harden to maintain records of VOC-content of coatings that can be produced in a expeditious manner.

6 NYCRR 228-2.3 (g)

This condition requires Harden to utilize only industrial adhesives that comply with Table 1 on Part 228-2.

6 NYCRR 228-2.3 (i)

This condition instructs Harden to avoid the specification of any industrial adhesive, etc that fails to comply with Part 228-2.

6 NYCRR 228-2.5 (a)

This condition requires that Harden maintain records that demonstrate the VOC-content (and other parameters) of all industrial adhesives, etc that are in use.

6 NYCRR Part 226

This condition makes clear the need for equipment standards and work practices for cold cleaning degreasers.

6 NYCRR Subpart 201-7

This facility has 4 federally enforceable caps that are capped under 6NYCRR201-7.

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



**Permit ID: 6-3020-00024/00061**  
**Renewal Number: 2**  
**08/23/2012**

6 NYCRR Subpart 231-1

This condition is New Source Review (NSR), but specifically for Sources that were subject to regulation prior to 11/15/1992.

6 NYCRR Subpart 231-2

This condition is New Source Review (NSR), but specifically for Sources that were subject to regulation between 11/15/1992 and 2/19/2009.

**Compliance Certification**  
**Summary of monitoring activities at HARDEN FURNITURE INC:**

| <b>Location<br/>Facility/EU/EP/Process/ES</b> | <b>Cond No.</b> | <b>Type of Monitoring</b>  |
|---|-----------------|--|
| -----   |                 |  |
| ---   |                 |  |
| 0-POWER/-/BW3<br>FACILITY                     | 70              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 42              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 72              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 43              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 44              | work practice involving specific operations                        |
| 0-POWER/-/BW3<br>FACILITY                     | 69              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 45              | monitoring of process or control device parameters<br>as surrogate |
| 0-POWER/-/BW3<br>FACILITY                     | 46              | monitoring of process or control device parameters<br>as surrogate |
| 0-POWER/-/BW3<br>FACILITY                     | 47              | monitoring of process or control device parameters<br>as surrogate |
| 0-POWER/-/BW3<br>FACILITY                     | 22              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 23              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 24              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 25              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 26              | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 5               | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 6               | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 29              | work practice involving specific operations                        |
| 0-POWER/-/BW3<br>FACILITY                     | 30              | work practice involving specific operations                        |
| 0-POWER/-/BW3<br>FACILITY                     | 31              | work practice involving specific operations                        |
| 0-POWER/-/BW3<br>FACILITY                     | 32              | work practice involving specific operations                        |
| 0-POWER/-/BW3<br>FACILITY                     | 7               | record keeping/maintenance procedures                              |
| 0-POWER/-/BW3<br>FACILITY                     | 76              | record keeping/maintenance procedures                              |
| 0-FINIS<br>FACILITY                           | 51              | record keeping/maintenance procedures                              |
| 0-FINIS<br>FACILITY                           | 53              | work practice involving specific operations                        |
| 0-FINIS<br>FACILITY                           | 54              | record keeping/maintenance procedures                              |
| 0-FINIS<br>FACILITY                           | 34              | record keeping/maintenance procedures                              |
| 0-FINIS<br>FACILITY                           | 35              | record keeping/maintenance procedures                              |
| 0-FINIS<br>FACILITY                           | 36              | intermittent emission testing                                      |
| 0-FINIS<br>FACILITY                           | 37              | intermittent emission testing                                      |
| 0-FINIS<br>FACILITY                           | 38              | intermittent emission testing                                      |
| 0-POWER<br>FACILITY                           | 68              | record keeping/maintenance procedures                              |
| 0-POWER<br>FACILITY                           | 39              | monitoring of process or control device parameters<br>as surrogate |
| 0-POWER<br>FACILITY                           | 40              | record keeping/maintenance procedures                              |



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

**Permit ID: 6-3020-00024/00061**

**Renewal Number: 2**

**08/23/2012**

|          |    |  |
|----------|----|--|
| 0-FINIS  | 67 | record keeping/maintenance procedures                              |
| 0-FINIS  | 56 | record keeping/maintenance procedures                              |
| FACILITY | 41 | monitoring of process or control device parameters<br>as surrogate |
| 0-FINIS  | 58 | record keeping/maintenance procedures                              |
| 0-FINIS  | 60 | record keeping/maintenance procedures                              |
| 0-FINIS  | 61 | work practice involving specific operations                        |
| 0-FINIS  | 62 | work practice involving specific operations                        |
| 0-FINIS  | 63 | work practice involving specific operations                        |
| 0-FINIS  | 64 | work practice involving specific operations                        |
| 0-FINIS  | 65 | work practice involving specific operations                        |
| 0-FINIS  | 66 | work practice involving specific operations                        |

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**Basis for Monitoring**

All monitoring activities have been explained/justified under "Facility Specific Requirement".