

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

**Issue Date:**

**Region:** Asheville Regional Office  
**County:** Caldwell  
**NC Facility ID:** 1400041  
**Inspector's Name:** Patrick Ballard  
**Date of Last Inspection:** 07/27/2022  
**Compliance Code:** 3 / Compliance - inspection

<p style="text-align: center;"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> Fairfield Chair Plant No. 2</p> <p><b>Facility Address:</b>                  Fairfield Chair Plant No. 2                  606 Kincaid Circle SW                  Lenoir, NC 28645</p> <p><b>SIC:</b> 2512 / Upholstered Household Furniture  <b>NAICS:</b> 337121 / Upholstered Household Furniture Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p style="text-align: center;"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b> 02D .0503, .0504, .0512, .0516, .0521  <b>NSPS:</b> NA  <b>NESHAP:</b> Subpart JJJJJ; 02Q .0317 (MACT Avoidance)  <b>PSD:</b> NA  <b>PSD Avoidance:</b> NA  <b>NC Toxics:</b> NA  <b>112(r):</b> NA  <b>Other:</b> 02D .1806</p>
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Contact Data			Application Data
<p style="text-align: center;"><b>Facility Contact</b></p> Rick Pierce Environmental Manager (828) 758-5571 PO Box 1710 Lenoir, NC 28645	<p style="text-align: center;"><b>Authorized Contact</b></p> Michael Hundley VP of Operations (828) 758-5571 PO Box 1710 Lenoir, NC 28645	<p style="text-align: center;"><b>Technical Contact</b></p> Rick Pierce Environmental Manager (828) 758-5571 PO Box 1710 Lenoir, NC 28645	<p><b>Application Number:</b> 1400041.22A  <b>Date Received:</b> 08/26/2022  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 02646/T15  <b>Existing Permit Issue Date:</b> 02/20/2019  <b>Existing Permit Expiration Date:</b> 03/31/2023</p>

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	0.2400	4.66	52.15	5.71	4.23	3.92	2.34 [Xylene (mixed isomers)]
2020	0.2700	5.20	60.75	6.37	4.22	4.51	2.74 [Xylene (mixed isomers)]
2019	0.2200	4.34	80.27	5.31	4.38	5.13	2.96 [Xylene (mixed isomers)]
2018	0.1500	2.95	76.62	3.61	3.79	5.90	2.21 [Xylene (mixed isomers)]
2017	0.1800	3.59	95.58	4.39	4.46	7.42	2.35 [Toluene]

<p><b>Review Engineer:</b> Eric L. Crump, P.E.</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 02646/T16  <b>Permit Issue Date:</b>  <b>Permit Expiration Date:</b></p>
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## 1. Purpose of Application

Fairfield Chair Plant No. 2 (hereinafter referred to as Fairfield) is an upholstered household furniture manufacturing facility located in Lenoir, Caldwell County, North Carolina. The facility currently operates under Title V Permit No. 02646T15 with an expiration date of March 31, 2023. Fairfield has applied for renewal of their Title V air quality permit. The renewal application was received on August 26, 2022, or at least six months prior to the expiration date as required by General Condition 3.K of the current permit. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

Fairfield has not reported the addition, removal, or modification of any sources in permit renewal application No. 1400041.22A.

## 2. Facility Description

Fairfield manufactures and finishes chairs. The facility receives imported unfinished chair frames and unfinished chair frames from Fairfield Chair Plant No. 1. Once received, the frames are sanded, finished, and upholstered. Except for the finish sanding, little woodworking is currently done at this facility. In addition, wood waste from Plant No. 1 is transported to Fairfield, where it is ground using a wood hog, and used for boiler fuel. The wood kilns at the facility were shut down in August 2015. Since then, wood has been purchased already kiln-dried to reduce boiler operating costs and to save energy on cooling the facility in the summer. This was the result of recommendations made within the energy assessment performed in accordance with the generally available control technology (GACT) standard for area source boilers (40 CFR Part 63, Subpart JJJJJ).

## 3. Application Chronology

April 11, 2018	Division of Air Quality (DAQ) issues Air Permit No. 02646T14 to Fairfield as a Title V renewal.
January 14, 2019	Fairfield sends letter to the Asheville Regional Office (ARO) to alert them of administrative errors in Air Permit No. 02646T14. Fairfield requests an administrative amendment to change the once-a-day inspection requirement in Sections 2.1 C.2.c.i and 2.1 D.2.c.i to once-a-month.
February 20, 2019	DAQ issues Air Permit No. 02646T15 to Fairfield as an administrative amendment.
August 26, 2022	DAQ receives permit renewal application No. 1400041.22A from Fairfield.
March 20, 2023	DAQ sends draft permit and review to Stationary Source Compliance Branch (SSCB) and ARO for review and comment.
March 24, 2023	DAQ receives comments on draft permit and review from SSCB.
March 27, 2023	Draft permit and review sent for DAQ supervisory review.
April 21, 2023	DAQ supervisor provides comments on draft permit and review.
May 15, 2023	DAQ sends draft permit to Fairfield and ARO for review and comment.

May 15, 2023           DAQ receives comments on draft permit from ARO.

xxx                       Permit renewal notice published, 30-day public notice and comment period begins, and 45-day EPA comment period begins.

xxx                       30-day public notice and comment period ends.

xxx                       45-day EPA comment period ends.

#### 4. Changes to Permit and Title V Equipment Editor (TVEE) Discussion

The following table summarizes changes made to the current Fairfield permit with this permit renewal:

Page No.	Section	Description of Changes
Cover and throughout	---	<ul style="list-style-type: none"> <li>Updated all dates and permit revision numbers</li> <li>Changed all citations of 15A NCAC 2D to 15A NCAC 02D</li> <li>Changed all citations of 15A NCAC 2Q to 15A NCAC 02Q</li> </ul>
Insignificant Activities List	Attachment	Moved to Section 3 of permit
2	Table of Contents	Changed Section 3 from “General Conditions” to “Insignificant Activities per 15A NCAC 02Q .0503(8)” Added new Section 4, “General Conditions”
3	List of Acronyms	Relocated here (formerly last page of permit)
5	2.1 A.1.c, d, and f	Updated section to reflect the most current stipulations for 15A NCAC 02D .0504
6	2.1 A.3.c	Updated section to reflect the most current stipulations for 15A NCAC 02D .0521
7	2.1 A.4	Updated section to reflect the most current stipulations for 15A NCAC 02D .1111 and 40 CFR Part 63, Subpart JJJJJ
11	2.1 C.1.b, c, and e	Updated section to reflect the most current stipulations for 15A NCAC 02D .0512
12	2.1 C.2.c	Updated section to reflect the most current stipulations for 15A NCAC 02D .0521
13	2.1 D.1.b, c, and e	Updated section to reflect the most current stipulations for 15A NCAC 02D .0512
14	2.1 D.2.c	Updated section to reflect the most current stipulations for 15A NCAC 02D .0521
15	2.2 A.2.b	Minor edits to improve clarity and readability, including changing the variable “Z” in the equation for total HAPs to “Y”
17	3	Section 3 is now “Insignificant Activities per 15A NCAC 02Q .0503(8)”
18-26	4	<ul style="list-style-type: none"> <li>Moved from Section 3 to Section 4</li> <li>Updated General Conditions to Version 6.0 dated January 7, 2022</li> </ul>

No changes were made to the TVEE as a result of this renewal.

#### 5. Description of Changes and Estimated Emissions

Fairfield has not reported the addition, removal, or modification of any sources at the facility. No changes in emissions are expected.

## 6. Regulatory Review

Fairfield is subject to the following state regulations, in addition to the requirements in the General Conditions:

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers. This rule applies to particulate matter (PM) emissions from the combustion of fuel in indirect heat exchangers, such as boilers, that are discharged from any stack or chimney into the atmosphere. The regulation provides the following equation for determining the allowable emissions limit as a function of maximum heat input:

$$E = 1.090 \times Q^{-0.2594}$$

Where:

- E = allowable emissions limit for PM in pounds per million British thermal units (lb/MMBtu); and
- Q = maximum heat input<sup>1</sup> in million Btu per hour (MMBtu/hr).

Fairfield has one natural gas-fired boiler (ID No. ES-016) with a 20.9 million mmBtu/hr maximum heat input rate. Using the above equation, the allowable emissions limit for PM is

$$E = 1.090 \times (20.9)^{-0.2594} = 0.50 \text{ lb of PM per MMBtu heat input.}$$

Natural gas being a relatively clean fuel with regard to PM emissions, an exceedance of this PM limit is unlikely. For this reason, monitoring, recordkeeping, and reporting are not required for this source when firing natural gas. This permit renewal does not affect this status. Continued compliance is expected.

15A NCAC 02D .0504, Particulates from Wood Burning Indirect Heat Exchangers. This regulation applies to fuel burning equipment that burns 100 percent wood (with no other fuels in combination) for the primary purpose of producing heat or power by indirect heat transfer. PM emissions from wood combustion shall not exceed the allowable limits in the following table:

Maximum Heat Input (MMBtu/hr)	Allowable Emission Limit (lb/MMBtu)
≤ 10	0.70
100	0.41
1,000	0.25
≥ 10,000	0.15

If the heat input falls between any two consecutive heat inputs listed in the above table, the allowable PM emission limit shall be calculated using the following equation:

$$E = 1.1698 \times Q^{-.2230}$$

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<sup>1</sup> As defined in this rule, the maximum heat input is the total heat content of all fuels and is the sum of maximum heat input of all fuel burning indirect heat exchangers at a plant site which are in operation, under construction, or permitted when determining the allowable emission limit for each fuel burning indirect heat exchanger.

Where:

E = allowable emissions limit for PM in pounds per million Btu (lb/MMBtu); and

Q = maximum heat input in million Btu per hour (MMBtu/hr).

The two wood-fired boilers (ID Nos. ES-001 and ES-002) are subject to this regulation. Each has a maximum heat input rate of 13.5 MMBtu/hr. Using the above formula, the allowable PM emission limit is:

$$E = 1.1698 (13.5 + 13.5)^{-2.230} = 0.56 \text{ lb/MMBtu heat input.}$$

In addition, Fairfield is required to inspect and maintain the boiler multicyclones (ID Nos. CD-001 and CD-002) as recommended by the manufacturer. The inspection and maintenance requirement must include a monthly external visual inspection of the system ductwork and material collection units for leaks; and an internal inspection of the multicyclones' structural integrity. The results of inspection and maintenance must be recorded in a logbook. Fairfield must submit a semiannual summary report of the monitoring and recordkeeping results, including any deviations from permit requirements. This permit renewal does not affect this status. Continued compliance is expected.

15A NCAC 02D .0512, Particulates from Wood Products Finishing Plants. This rule prohibits the discharge of particulate matter caused by the working, sanding, or finishing of wood from any stack, vent, or building into the atmosphere without providing ductwork and collectors “. . . that are properly designed and adequate to collect particulate to the maximum extent practicable . . . In no case shall the ambient air quality standards be exceeded beyond the property line. “

The eight dry filter-type spray booths (ID Nos. ES-004 through ES-011) within the wood furniture finishing operations, the woodworking operations (ID No. ES-014), and the sanding operations (ID No. ES-018) are subject to this regulation. The ductwork and collectors for the spray booths must be regularly inspected and maintained. At a minimum, the inspection and maintenance program shall include weekly inspection of the spray booth filters, and annual inspection of the associated ductwork, noting structural integrity. The four cyclones (ID Nos. CD-003 through CD-006) and two bagfilters (ID Nos. CD-007 and CD-008) controlling the woodworking and sanding operations must be inspected and maintained per manufacturers' recommendations, and shall at a minimum include monthly inspection of the ductwork and control devices for structural integrity, and annual internal bagfilter inspections for their condition and structural integrity. Fairfield must submit a semiannual summary report of the monitoring and recordkeeping results, including any deviations from permit requirements, and the inspection and maintenance results for the cyclones and bagfilters. This permit renewal does not affect this status. Continued compliance is expected.

15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources. Under this regulation, emissions of sulfur dioxide (SO<sub>2</sub>) from any source of combustion discharged from any vent, stack, or chimney shall not exceed 2.3 pounds of SO<sub>2</sub> per million British thermal units (MMBtu) input.

The natural gas-fired boiler (ID No. ES-016) is subject to this rule. Because natural gas is a relatively clean fuel with regard to SO<sub>2</sub> emissions, an exceedance of this SO<sub>2</sub> limit is unlikely. For this reason, monitoring, recordkeeping, and reporting are not required for this source when firing natural gas. This permit renewal does not affect this status. Continued compliance is expected.

15A NCAC 02D .0521, Control of Visible Emissions: This regulation establishes opacity limits for visible emissions generated by fuel burning operations and industrial processes where visible emissions are expected to occur (except during startups, shutdowns, and malfunctions approved according to procedures in 15A NCAC 02D .0535, Excess Emissions Reporting and Malfunctions).

The regulation establishes opacity limits for visible emissions from sources based on the date the sources were manufactured.

The two wood-fired boilers (ID Nos. ES-001 and ES-002), the natural gas-fired boiler (ES-016), the eight dry filter-type spray booths (ID Nos. ES-004 through ES-011), the woodworking and sanding operations (ID Nos. ES-014 and ES-018, respectively) are subject to this rule. Because the sources at the Fairfield facility subject to this rule were manufactured after July 1, 1971, they are limited to 20 percent opacity averaged over a six-minute period. The six-minute averaging periods may exceed 20 percent not more than once in any hour, and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

The sources are subject to the following monitoring and recordkeeping and reporting requirements for visible emissions:

Source	Frequency of observation for visible emissions above normal	If emissions observed to be above normal	Reporting requirements
Two wood-fired boilers (ID Nos. ES-001 and ES-002)	Daily	Take action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken -- or demonstrate the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below 20 percent.	Submittal of semiannual summary reports of the monitoring and recordkeeping results, including any deviations from permit requirements.
Woodworking operations (ID No. ES-014) Sanding operations (ID No. ES-018)	Weekly		
Eight dry filter-type spray booths (ID Nos. ES-004 through ES-011)	Monthly		
Natural gas-fired boiler (ES-016)	None	N/A	None

Note that while the natural gas-fired boiler (ES-016) is also subject to this rule and the 20 percent opacity limit, natural gas is a relatively clean fuel, with little to no visible emissions when burned. Since an exceedance of the visibility limit is unlikely, no monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas in this boiler.

This permit renewal does not affect the requirements for these sources regarding 15A NCAC 02D .0521. Continued compliance is expected.

15A NCAC 02D .0614: Compliance Assurance Monitoring [40 CFR 64] – see Section 11 of this review.

15A NCAC 02D .1100, Control of Toxic Air Pollutants – see Section 12 of this review.

15A NCAC 02D .1111, Maximum Achievable Control Technology – see Section 7 of this review.

15A NCAC 02Q .0711, Emission Rates Requiring a Permit – see Section 12 of this review.

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions. This rule, which applies facility-wide and is state-enforceable only, provides for the control and prohibition of objectionable

odorous emissions. The rule requires Fairfield to implement management practices or install and operate odor control equipment sufficient to prevent odorous emissions from causing or contributing to objectionable odors beyond the facility's boundary.

15A NCAC 02Q .0317, Avoidance Conditions. Under this regulation, the owner or operator of a facility may ask DAQ to place terms and conditions in that facility's permit to avoid the applicability of certain regulatory requirements. DAQ may require monitoring, recordkeeping, and reporting as needed to provide assurance that the avoidance conditions are being met. The Fairfield permit has avoidance conditions for 15A NCAC 02D .1111, Maximum Achievable Control Technology. These are discussed in more detail in Section 7 of this review.

Note: The permit has been updated to reflect the most current stipulations for all applicable regulations.

**7. National Emission Standards for Hazardous Air Pollutants (NESHAPS): Maximum and/or Generally Achievable Control Technology (MACT/GACT)**

The two wood-fired boilers (ID No. ES-001 and ES-002) at Fairfield are subject to 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers—hereinafter referred to as GACT JJJJJ. Under this GACT rule, Fairfield must conduct an initial boiler tune-up (completed 3/10/2014), a one-time energy assessment (performed 3/18/2014), and perform subsequent tune-ups biennially. Records must be kept to document conformance with the performance tune-ups (e.g., dates, procedures, carbon monoxide and oxygen concentrations in the effluent stream, corrective actions). In addition, records of malfunctions and corrective actions taken must be kept. Reporting shall be in accordance with the General Conditions of the permit. This permit renewal does not affect this status. Continued compliance is expected.

As discussed in the permit review for Air Permit No. 02646T12 (David Putney, 12/06/2007), Fairfield elected to accept an avoidance condition in their permit to avoid being a major source subject to MACT standards under 40 CFR Part 63 – more specifically, Subparts JJ (National Emission Standards for Wood Furniture Manufacturing Operations), DDDD (National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products), and DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters). The MACT avoidance condition in Air Permit No. 02646T11 neglected to require the Permittee to include HAP contributions from the boilers or the lumber kilns. Based on DAQ boiler emissions estimation spreadsheets and steam-heated kiln emission factors at the time of the review, potential emissions from the boilers and kilns are shown in the following table.

Emission Source	Potential HAP Emissions, tons per year	
	Largest individual HAP	Total HAP
Two wood-fired boilers (ES-001 and ES-002 combined)	2.25	4.59
Natural gas-fired boiler (ES-016)	0.16	0.17
Three steam-heated lumber kilns (combined)	0.14	0.22

Since the quantity of HAPs emitted from the natural gas-fired boiler and the lumber kilns is so small, Fairfield elected to reduce the HAP emissions limits from the MACT avoidance condition in Air Permit 02646T11 by an amount equal to the potential HAP emissions from these sources, thereby avoiding any monitoring, recordkeeping, and reporting requirements for the gas-fired boiler or kilns. The resulting facility-wide emissions limits for the MACT avoidance condition are:

$$\begin{aligned} \text{Largest individual HAP} &= 10 - 0.16 - 0.14 = 9.70 \text{ tons per year} \\ \text{Total HAP} &= 25 - 0.17 - 0.22 = 24.61 \text{ tons per year} \end{aligned}$$

Fairfield is required to maintain the following records:

- monthly consumption records of each material used in the wood furniture finishing operations containing HAPs
- purchase orders and invoices of materials containing HAPs used in the wood furniture finishing operations, and
- records of monthly fuel use and HAP emission calculations for the wood-fired boilers, using the following equations:

$$\text{Largest individual HAP (pounds)} = Y \times [16 \text{ (million Btu/ton)}] \times [0.019 \text{ (pound HAP/million Btu)}]$$

$$\text{Total HAP (pounds)} = Y \times [16 \text{ (million Btu/ton)}] \times [0.0388 \text{ (pound HAP/million Btu)}]$$

where Y = tons of wood combusted during that time period .

This permit renewal does not affect this status. Continued compliance is expected.

### **8. New Source Performance Standards (NSPS)**

No NSPS are applicable to any sources at Fairfield. This permit renewal does not affect this status.

### **9. New Source Review (NSR)/Prevention of Significant Deterioration (PSD)**

The Fairfield facility is not subject to either NSR or PSD. This permit renewal does not affect this status.

### **10. Risk Management Plan (RMP) Requirements**

40 CFR Part 68 requires stationary sources storing more than threshold quantities of regulated substances to develop a RMP in accordance with Section 112(r) of the Clean Air Act. The RMP lists the potential effects of a chemical accident at the facility, steps the facility is taking to prevent an accident, and emergency response procedures to be followed if an accident should occur.

Fairfield is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect the 112(r) status of the facility.

### **11. Compliance Assurance Monitoring (CAM)**

The CAM rule (15A NCAC 02D .0614) applies to each pollutant specific emissions unit located at a major source that is required to obtain a Title V permit if it meets all of the following criteria:

- It is subject to an emission limitation or standard, and
- It uses a control device to achieve compliance, and
- It has potential pre-control emissions that equal or exceed the major source threshold (i.e., either 100 tpy for criteria pollutants, 10 tpy of any individual HAP, or 25 tpy of any combination of HAP).

The following emission limitations or standards are exempted from the CAM rule:



- NSPS or NESHAP standards proposed after November 15, 1990;
- Stratospheric ozone protection requirements under Title VI of the Clean Air Act
- Acid rain program requirements;
- Emission limitations or standards or other requirements that apply solely under an approved emissions trading program;
- An emissions cap that meets requirements of 40 CFR 70.4(b)(12) or 71.6(a)(13);
- Emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance determination method, as defined in 40 CFR 64.1, unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (e.g., a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).
- Certain municipally owned utility units, as defined in 40 CFR 72.2.

Please note that the emission unit is not exempted from the CAM rule if nonexempt emission limitations or standards (e.g. a state rule or an older NSPS emission limits) apply to the emissions unit.

The following table lists the sources at Fairfield with control devices that are subject to emission standards:

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
ES-001	One wood-fired boiler (13.5 million Btu per hour maximum heat input rate)	CD-001	Zurn multicyclone (12 nine-inch diameter tubes)
ES-002	One wood-fired boiler (13.5 million Btu per hour maximum heat input)	CD-001	Zurn multicyclone (12 nine-inch diameter tubes)
ES-014	Woodworking operations	CD-003 CD-005 CD-006  CD-004  CD-007	Three simple cyclones (42, 96, and 96 inches in diameter, respectively)  One simple cyclone (132 inches in diameter) One bagfilter (2,300 square feet of filter area)
ES-018	Sanding operations	CD-008	One bagfilter (4,068 square feet of filter area)

CAM was determined in a preceding permit review (David Putney, 12/06/2007, Air Permit No. 02646T12) to not be applicable because the potential pre-controlled emissions of criteria and/or air toxics for the above sources did not exceed major source thresholds. Since then, there have been no changes to the Fairfield facility that affect potential pre-controlled emissions from these sources, and no additional sources have been added. This permit renewal does not affect this status with respect to CAM. Continued compliance is expected.

## 12. Facility-wide Air Toxics Review

The Fairfield permit does not include any specific conditions associated with the NC Toxics Program. Their current renewal application does not include the addition of any new sources. Therefore, no air toxics review is warranted at this time. In addition, since Fairfield is subject to 40 CFR Part 63, Subpart JJJJJ as discussed in Section 7 of this review, it is exempt from toxics permitting in accordance with 15A NCAC 02Q .0702(a)(27)(A).

## 13. Facility Emissions Review

The table in the header page of this review summarizes emissions Fairfield has reported in annual emissions inventories from 2017 through 2021 after application of required emission controls. Over this period, facility-wide emissions of VOC and HAP have decreased, while emissions of other criteria pollutants have varied somewhat without large changes.

## 14. Compliance History and Status

The following chronology dates from when the Fairfield permit was last renewed on April 11, 2018.

December 18, 2018	Patrick Ballard, ARO conducts facility compliance inspection. Facility appeared to be operating in compliance with all permit requirements.
February 7, 2020	ARO issues Notice of Violation (NOV) to Fairfield for failing to submit semi-annual compliance reports by January 30 as required by the permit.
February 17, 2020	Fairfield responds to NOV in writing, stating action to be taken to prevent future violations.
July 30, 2020	Patrick Ballard, ARO, conducts facility compliance inspection. Facility appeared to be operating in compliance with all permit requirements.
March 23, 2021	Patrick Ballard, ARO, visits Fairfield facility, observing remotely from the parking lot due to COVID-19 virus work restrictions.
April 15, 2021	Patrick Ballard, ARO, speaks with Rick Pierce (Fairfield facility contact) about current operations at the site to complete the facility compliance inspection requirements under COVID-19 virus work restrictions. Facility appeared to be operating in compliance with all permit requirements.
July 27, 2022	Patrick Ballard and Bob Graves, ARO, conduct facility compliance inspection. Facility appeared to be operating in compliance with all permit requirements.

In summary, the only compliance issue since the last permit renewal was one late submittal of required semiannual compliance reports. From all other observations, Fairfield appears to have been in compliance with the requirements of their Title V air permit.

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

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A

NCAC 02Q .0518(b), the EPA will have a 45-day review period. In general, as agreed by DAQ and EPA Region 4, EPA’s 45-day review period will run concurrent with the 30-day comment period unless advised otherwise. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

Virginia, South Carolina, and Tennessee are affected states within 50 miles of the facility. The Forsyth County Office of Environmental Assistance and Protection is an affected local program.

Notice of the DRAFT Title V Permit to Affected States ran from **XXXX**, 2023, to **XXXX**, 2023. ***Discuss any comments received from Affected States or Local Programs.***

Public Notice of the DRAFT Title V Permit ran from **XXXX**, 2023, to **XXXX**, 2023. ***Discuss any public comments received.***

EPA’s 45-day review period ran concurrent with the 30-day Public Notice, from **XXXX**, 2023, to **XXXX**, 2023. ***Discuss any comments received from EPA and U.S. EPA Region 4 regarding the DRAFT Title V Permit.***

## **16. Other Regulatory Considerations**

The following items were not required for Permit Application No. 1400041.22A:

- Professional Engineer’s seal
- Zoning consistency determination
- Permit fee.

## **17. Recommendations**

DAQ has reviewed the permit renewal application for Fairfield Chair Plant No. 2 located in Lenoir, Caldwell County to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 02646T16.