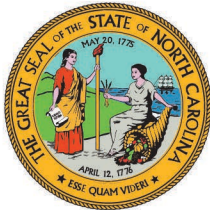


ROY COOPER
Governor

ELIZABETH S. BISER
Secretary

MICHAEL ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

TBD, 2023

Mr. Rich Dixon
General Manager
Dura-Supreme, LLC - Statesville
607 Meacham Road
Statesville, NC 28677

SUBJECT: Air Quality Permit No. 10787R00
Facility ID: 4900314
Dura-Supreme, LLC - Statesville
Statesville
Iredell County
Fee Class: Title V
PSD Class: Minor

Dear Mr. Dixon:

In accordance with your completed Air Quality Permit Application for a Greenfield Facility, we are forwarding herewith Air Quality Permit No. 10787R00 authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been identified as such in the permit.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to file a petition for contested case hearing in the North Carolina Office of Administrative Hearings. Information regarding the right, procedure, and time limit for permittees and other persons aggrieved to file such a petition is contained in the attached "Notice Regarding the Right to Contest A Division of Air Quality Permit Decision."

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to existing emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.



North Carolina Department of Environmental Quality | Division of Air Quality
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641
919.707.8400

Mr. Dixon
TBD, 2023
Page 2

Iredell County has triggered minor source baseline dates for PM₁₀, SO₂, and NO_x. This new facility construction will result in an increase in 17.7 pounds per hour of PM₁₀, 0.013 pounds per hour of SO₂, and 2.36 pounds per hour of NO_x.

This Air Quality Permit shall be effective from TBD 8, 2023 until TBD, 2031, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Richard Simpson, at (919) 707-8476 or Richard.Simpson@deq.nc.gov.

Sincerely yours,

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section
Division of Air Quality, NCDEQ

Enclosure

c: Laserfiche (4900314)
Connie Horne (cover letter only)

**NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT
DECISION**

Right of the Permit Applicant or Permittee to File a Contested Case: Pursuant to NCGS 143-215.108(e), a permit applicant or permittee who is dissatisfied with the Division of Air Quality's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 in the Office of Administrative Hearings within 30 days after the Division notifies the applicant or permittee of its decision. If the applicant or permittee does not file a petition within the required time, the Division's decision on the application is final and is not subject to review. The filing of a petition will stay the Division's decision until resolution of the contested case.

Right of Other Persons Aggrieved to File a Contested Case: Pursuant to NCGS 143-215.108(e1), a person other than an applicant or permittee who is a person aggrieved by the Division's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 within 30 days after the Division provides notice of its decision on a permit application, as provided in NCGS 150B-23(f), or by posting the decision on a publicly available Web site. The filing of a petition under this subsection does not stay the Division's decision except as ordered by the administrative law judge under NCGS 150B-33(b).

General Filing Instructions: A petition for contested case hearing must be in the form of a written petition, conforming to NCGS 150B-23, and filed with the Office of Administrative Hearings, 1711 New Hope Church Road, Raleigh NC, 27609, along with a fee in an amount provided in NCGS 150B-23.2. A petition for contested case hearing form may be obtained upon request from the Office of Administrative Hearings or on its website at <https://www.oah.nc.gov/hearings-division/filing/hearing-forms>. Additional specific instructions for filing a petition are set forth at 26 NCAC Chapter 03.

Service Instructions: A party filing a contested case is required to serve a copy of the petition, by any means authorized under 26 NCAC 03 .0102, on the process agent for the Department of Environmental Quality:

William F. Lane, General Counsel
North Carolina Department of Environmental Quality
1601 Mail Service Center
Raleigh, North Carolina 27699-1601

If the party filing the petition is a person aggrieved other than the permittee or permit applicant, the party **must also** serve the permittee in accordance with NCGS 150B-23(a).

* * *

Additional information is available at <https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case>. Please contact the OAH at 984-236-1850 or oah.postmaster@oah.nc.gov with all questions regarding the filing fee and/or the details of the filing process.

Summary of Changes to Permit

Page No.	Section	Description of Changes
N/A	N/A	N/A - Initial permit for this Greenfield Facility



State of North Carolina
Department of Environmental Quality
Division of Air Quality

AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
10787R00	N/A	TBD, 2023	TBD, 2031

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: **Dura-Supreme, LLC - Statesville**
Facility ID: **4900314**
Primary SIC Code: **2434**
NAICS Code: **337110**

Facility Site Location: **607 Meacham Road**
City, County, State, Zip: **Statesville, Iredell County, North Carolina 28677**
Mailing Address: **607 Meacham Road**
City, State, Zip: **Statesville, North Carolina 28677**

Application Number(s): **4900314.23A**
Complete Application Date(s): **May 12, 2023**

Division of Air Quality,
Regional Office Address: **Mooresville Regional Office**
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115

Table of Contents

LIST OF ACRONYMS

- SECTION 1: PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES
- SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS
- 2.1 Emission Source(s) Specific Limitations and Conditions (Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)
 - 2.2 Multiple Emission Source(s) Specific Limitations and Conditions (Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)
- SECTION 3: INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)
- SECTION 4: GENERAL PERMIT CONDITIONS

List of Acronyms

AOS	Alternative Operating Scenario
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CEDRI	Compliance and Emissions Data Reporting Interface
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
CSAPR	Cross-State Air Pollution Rule
DAQ	Division of Air Quality
DEQ	Department of Environmental Quality
EMC	Environmental Management Commission
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
GHGs	Greenhouse Gases
HAP	Hazardous Air Pollutant
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NAA	Non-Attainment Area
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NCAC	North Carolina Administrative Code
NCGS	North Carolina General Statutes
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
OAH	Office of Administrative Hearings
PAE	Projected Actual Emissions
PAL	Plantwide Applicability Limitation
PM	Particulate Matter
PM_{2.5}	Particulate Matter with Nominal Aerodynamic Diameter of 2.5 Micrometers or Less
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	Tons Per Year
VOC	Volatile Organic Compound

SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 through 9 MACT JJ	Nine dry filter-type spray booths	NA	NA
ES-10	Woodworking activities	CD-10 and CD-11	Two bagfilters (6,900 and 4,368 square feet of filter area, respectively)

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1 Emission Source(s) and Control Device(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

A. Nine (9) dry filter-type spray booths (ID Nos. ES-1 through ES-9)

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Hazardous air pollutants	MACT Standards	15A NCAC 02D .1111 (40 CFR Part 63, Subpart JJ)
-	(ID Nos. All emissions sources included in 2.1 A) See Section 2.2 A.1	15A NCAC 02D .0535
Volatile Organic Compounds (VOC)	Less than 250 tons of VOC per consecutive 12-month period See Section 2.2 A.2	15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530
Odor	(ID Nos. All emissions sources included in 2.1 A) See Section 2.2 A.3	15A NCAC 02D .1806
-	See Section 2.2 A.4	15A NCAC 02Q .0504
-	See Section 2.2 A.5	15A NCAC 02Q .0304(d) and (f)
-	See Section 2.2 A.6	15A NCAC 02Q .0207

1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 02Q .0308(a)]

- b. Particulate matter emissions from the dry filter-type spray booths (ID Nos. ES-1 through ES-9) shall be controlled by adequate ductwork and properly designed collectors. To ensure compliance, the Permittee shall perform inspections and maintenance. As a minimum, the inspection and maintenance program shall include:
 - i. weekly inspection of the spray booths' filters noting the condition; and
 - ii. annual (for each 12-month period following the initial inspection) inspection of the associated ductwork noting structural integrity.

Recordkeeping [15A NCAC 02Q .0308(a)]

- c. The results of inspection and maintenance required by Section 2.1 A.1.b above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any filters.

Reporting [15A NCAC 02Q .0308(a)]

- d. The Permittee shall submit the results of any maintenance performed on the filters or ductwork within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities required by Sections 2.1 A.1.b and c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (**ID Nos. ES-1 through ES-9**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, 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.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Conditions in Section 4.

Monitoring [15A NCAC 02Q .0308(a)]

- c. To ensure compliance, once a month, the Permittee shall observe the emission points of these sources (**ID Nos. ES-1 through ES-9**) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. The Permittee shall establish “normal” for these sources in the first 30 days following the beginning of operation. If visible emissions from these source(s) are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that 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 the limit given in Section 2.1 A.2.a above.

Recordkeeping [15A NCAC 02Q .0308(a)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

Reporting [15A NCAC 02Q .0308(a)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.1 A.2.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

3. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (40 CFR Part 63, Subpart JJ)

Applicability

- a. The wood furniture manufacturing operations (**ID Nos. ES-1 through ES-9**) shall comply with all requirements of 15A NCAC 02D .1111 “Maximum Achievable Control Technology” and 40 CFR Part 63 Subpart JJ “National Emission Standards for Wood Furniture Manufacturing Operations.” [40 CFR 63.800]

Definitions and Nomenclature

- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.801 shall apply.

Regulated Pollutants

- c. Volatile Hazardous Air Pollutants (VHAP), Volatile Organic Compounds (VOC), and Organic HAP solvents as defined in 40 CFR 63.801.

General Provisions

- d. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A “General Provisions” according to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR Part 63, Subpart JJ.

Work Practice Standards

- e. The Permittee shall adhere to the work practice standards as specified by 40 CFR 63.803.
 - i. Recordkeeping Requirements – The Permittee shall prepare, maintain, and follow a written work practice implementation plan in accordance with 40 CFR 63.806(e) that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards specified in items (A) through (K) below:
 - (A) **Operator training** – in accordance with 40 CFR 63.803(b),
 - (B) **Inspection and maintenance plan** – in accordance with 40 CFR 63.803(c),
 - (C) **Cleaning and wash-off solvent accounting system** – in accordance with 40 CFR 63.803(d),
 - (D) **Chemical composition of cleaning and wash-off solvents** – in accordance with 40 CFR 63.803(e),
 - (E) **Spray booth cleaning** – in accordance with 40 CFR 63.803(f),
 - (F) **Storage requirements** – in accordance with 40 CFR 63.803(g),
 - (G) **Application equipment requirements** – in accordance with 40 CFR 63.803(h). Conventional air spray guns are allowed only when emissions are vented to a control device.
 - (H) **Line cleaning** – in accordance with 40 CFR 63.803(i),
 - (I) **Gun cleaning** – in accordance with 40 CFR 63.803(j),
 - (J) **Wash-off operations** – in accordance with 40 CFR 63.803(k), and
 - (K) **Formulation assessment plan** - in accordance with 40 CFR 63.803(l).
 - ii. Reporting Requirements – The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(8) and 63.807(b). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(8) and 40 CFR 63.807(c). The Permittee shall follow the reporting requirements in 40 CFR 64.807(e) as required and 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

Finishing Operations

- f. Per 40 CFR 63.804(a)(4), the Permittee has chosen to use both the compliant coatings and the facility averaging compliance options for the finishing operations listed above.

Recordkeeping Requirements – Compliance with each of these options is considered a separate ALTERNATIVE COMPLIANCE SCENARIO and the Permittee, prior to using a known non-compliance coating, i.e., knowingly switching from the use of compliant coatings to facility averaging as a compliance scenario, shall record in a logbook (written or electronic format) the scenario under which it is operating.

- i. Emission Limits – The Permittee shall either:
 - (A) comply with all provisions of 40 CFR 63.802(a)(1) and 63.804(a)(2) as applicable to the finishing operations listed above. All thinners, stains, washcoats, sealers, topcoats, basecoats, and enamels used at the facility shall meet the emission limitations as detailed in the following table:

Emission Source	Regulated Material	Emission Limitation
ES-1 through ES-9	Thinners	10% by weight HAP
	Stains, washcoats, sealers, topcoats, basecoats, and enamels	1.0 lb VHAP/lb solids (or kg VHAP per kg solids), as applied
	Washcoat, basecoat, or enamel formulated on-site	Coatings – 1.0 lb VHAP/lb solids (or kg VHAP per kg solids) Thinners – 3.0% by weight VHAP

OR

- (B) comply with all provisions of 40 CFR 63.802(a)(1) and 63.804(a)(1) as applicable to the finishing operations listed above. The weighted average VHAP content across all coatings, as applied, shall not exceed 1.0 lb VHAP per lb solids (1.0 kg VHAP per kg solids).
- ii. Compliance Procedures and Monitoring Requirements – The Permittee shall either:

- (A) demonstrate that only compliant thinners are being used and that all stains, washcoats, sealers, topcoats, basecoats, and enamels are compliant, as applied, in accordance with 40 CFR 63.804(g)(2) for Noncontinuous coaters and 40 CFR 63.804(g)(3) for continuous coaters, if applicable.
OR
- (B) demonstrate that the monthly average VHAP content for all finishing materials used at the facility is no greater than 1.0 lb VHAP per lb solids (1.0 kg VHAP per kg solids), as applied, in accordance with 40 CFR 63.804(g)(1).
- iii. Performance Test Method – EPA Method 311 [40 CFR 63, Appendix A] shall be used to determine the VHAP content of liquid coatings in accordance with 40 CFR 63.805(a).
- iv. Recordkeeping Requirements – The Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(2), 63.806(h), 63.806(i), and 63.806(j) and either:
 - (A) 63.804(g)(2-3) and 63.806(d),
OR
 - (B) 63.804(g)(1) and 63.806(c).
- v. Reporting Requirements – The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.807(b) and either: 40 CFR 63.804(f)(2), OR 40 CFR 63.804(f)(1). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.807(c) and either: 40 CFR 63.804(g)(2), OR 40 CFR 63.804(g)(1). The Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

Cleaning Operations

- g. i. Emission Limits - The Permittee shall comply with the limits of 40 CFR 63.802(a)(3) applicable to the strippable spray booth operations as detailed in the following table:

Emission Source	Regulated material	Emission Limitation
ES-1 through ES-9	strippable spray booth coatings	0.8 lb VOC per lb solids (or kg VOC/kg solids), as applied

- ii. Compliance Procedures and Monitoring Requirements - The Permittee shall demonstrate that only compliant strippable spray booth coatings are used in accordance with 40 CFR 63.804(g)(7).
- iii. Performance Test Method - EPA Method 311 [40 CFR Part 63 Appendix A] shall be used to determine the VHAP content of liquid coatings in accordance with 40 CFR 63.805(a).
- iv. Recordkeeping Requirements - The Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(3), 63.806(h), 63.806(i), and 63.806(j).
- v. Reporting Requirements - The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(7) and 63.807(b). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(7) and 63.807(c). The Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

Contact Adhesive Operations

- h. i. Emission Limits - The Permittee shall comply with all provisions of 40 CFR 63.802(a)(2) and 63.804(b-c) as applicable to the contact adhesive operation as detailed in the following table:

Emission Source	Regulated material	Emission Limitation
Gluing operations	Foam contact adhesives used in products which meet flammability requirements per California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies	1.8 lb VHAP per lb solids (or kg VOC/kg solids), as applied
	All other contact adhesives	1.0 lb VHAP/lb solids (or kg VOC/kg solids), as applied

- ii. Compliance Procedures and Monitoring Requirements - When emission source is using foam and other contact adhesives, the Permittee shall demonstrate that only compliant adhesives are used in accordance with 40 CFR 63.804(g)(5).
- iii. Performance Test Method - EPA Method 311 [40 CFR Part 63 Appendix A] shall be used to determine the VHAP content of liquid coatings in foam and other contact adhesives in accordance with 40 CFR 63.805(a).
- iv. Recordkeeping Requirements - When foam and other contact adhesives are used, the Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(2), 63.806(h), 63.806(i), and 63.806(j).
- v. Reporting Requirements - When foam and other adhesives are used, the Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(5) and 63.807(b). When foam and other contact adhesives are used, the Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(5) and 63.807(c). When foam and other contact adhesives are used, the Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

Formaldehyde Requirements

- i. The permittee shall comply with one of the following two options:
 - i. Option #1 (400 lb formaldehyde limit per rolling 12 month period) –
 - (A) Emissions Limits – In accordance with 40 CFR 63.802(a) and (b), limit total formaldehyde (F_{total}) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
 - (B) Compliance Procedures and Monitoring Requirements – In accordance with 40 CFR 63.804(h), calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of F_{total} no more than 400 pounds per rolling 12 month period.
 - (C) Recordkeeping Requirements – In accordance with 40 CFR 63.806(b), the Permittee shall keep records of the formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits of 40 CFR 63.802(a) and (b).
 - (D) Reporting Requirements - The Permittee shall submit semi-annual reports to the Regional Supervisor in accordance with 40 CFR 63.807(c).
 - ii. Option#2 (CPDS $\leq 1.0\%$ by weight formaldehyde) –
 - (A) Emissions Limits – In accordance with 40 CFR 63.802(a) and (b), use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations. *Low-formaldehyde* means, in the context of a coating or contact adhesive, a product concentration of less than or equal to 1.0 percent formaldehyde by weight, as described in a certified product data sheet for the material.
 - (B) Compliance Procedures and Monitoring Requirements – In accordance with 40 CFR 63.804(h), demonstrate compliance by use of coatings and contact adhesives only if they are *low-formaldehyde* coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used and submitting a compliance certification with the semi-annual report.
 - (C) Recordkeeping Requirements – In accordance with 40 CFR 63.806(b), the Permittee shall keep a certified product data sheet for each coating and contact adhesive used.
 - (D) Reporting Requirements - The Permittee shall submit semi-annual reports to the Regional Supervisor in accordance with 40 CFR 40 CFR 63.807(c) and 40 CFR 63.804(h). The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is not low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

B. Woodworking activities (ID No. ES-10) controlled by two (2) bagfilters (ID Nos. CD-10 and CD-11)

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulation
Particulate emissions	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
-	See Section 2.2 A.1	15A NCAC 02D .0535
-	See Section 2.2 A.4	15A NCAC 02Q .0504
-	See Section 2.2 A.5	15A NCAC 02Q .0304(d) and (f)
-	See Section 2.2 A.6	15A NCAC 02Q .0207

1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 02Q .0308(a)]

- b. Particulate matter emissions from woodworking activities (ID No. ES-10) shall be controlled by adequate ductwork and properly designed collectors. To ensure compliance, the Permittee shall perform inspections and maintenance. As a minimum, the inspection and maintenance program shall include:
 - i. weekly inspection of the woodworking bagfilters noting the condition; and
 - ii. annual (for each 12-month period following the initial inspection) inspection of the associated ductwork noting structural integrity.

Recordkeeping [15A NCAC 02Q .0308(a)]

- c. The results of inspection and maintenance required by Section 2.1 B.1.b above shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any filters.

Reporting [15A NCAC 02Q .0308(a)]

- d. The Permittee shall submit the results of any maintenance performed on the filters or ductwork within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities required by Sections 2.1 B.1.b and c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (ID No. ES-10) shall not be more than 20 percent opacity when averaged over a six-minute period. However, 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.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Conditions in Section 4.

Monitoring [15A NCAC 02Q .0308(a)]

- c. To ensure compliance, once a month, the Permittee shall observe the emission points of these sources (ID No. ES-10) for any visible emissions above normal. The monthly observation must be made for each month of the calendar

year period to ensure compliance with this requirement. The Permittee shall establish “normal” for these sources in the first 30 days following the beginning of operation. If visible emissions from these source(s) are observed to be above normal, the Permittee shall either:

- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
- ii. demonstrate that 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 the limit given in Section 2.1 B.2.a above.

Recordkeeping [15A NCAC 02Q .0308(a)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

Reporting [15A NCAC 02Q .0308(a)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.1 B.2.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

2.2 Multiple Emission Source(s) Specific Limitations and Conditions

A. Facility-wide Affected Sources

The following table provides a summary of limits and standards for the emission source(s) describe above:

Pollutant	Limits/Standards	Applicable Regulation
-	Excess emission reporting	15A NCAC 02D .0535
Volatile Organic Compounds	Less than 250 tons per 12-month period	15A NCAC 02Q .0317 Avoidance of 15A NCAC 02D .0530
Odor	State-enforceable only Odorous emissions must be controlled	15A NCAC 02D .1806
-	Permit application requirement	15A NCAC 02Q .0504
-	Permit renewal requirement	15A NCAC 02Q .0304(d) and (f)
-	Annual emission inventory requirement	15A NCAC 02Q .0207
-	State-enforceable only Requirement to disclose information relating to emissions of fluorinated chemicals	NCGS §143-215.108(d)(1) and 15A NCAC 02Q .0308(a)

1. 15A NCAC 02D .0535: EXCESS EMISSIONS REPORTING AND MALFUNCTIONS

Reporting Requirements for Excess Emissions [15A NCAC 02D .0535(f) and 02Q .0308(a)]

- a. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
- b. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
 - i. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
 - (A) notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
 - (1) name and location of the facility;
 - (2) nature and cause of the malfunction or breakdown;
 - (3) time when the malfunction or breakdown is first observed;
 - (4) expected duration; and
 - (5) estimated rate of emissions;
 - (B) notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
 - (C) submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

2. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. In order to avoid applicability of 15A NCAC 02D .0530, as requested by the Permittee, facility-wide volatile organic compounds (VOCs) emissions shall be less than 250 tons per consecutive 12-month period.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring/Recordkeeping [15A NCAC 02Q .0308(a)]

- c. To ensure compliance with the above limitations, the Permittee shall multiply the total amount of each type of VOC-containing material consumed in the wood furniture finishing operations during the calendar month by the VOC content of the material. The Permittee shall calculate the total emissions of VOCs monthly and shall record the

emissions monthly in a logbook (written or electronic format) kept on-site and made available to DAQ personnel upon request. Monthly VOC emissions, in tons, shall be calculated by the following equations:

$$E_{\text{VOC (total)}} = \sum E_{\text{VOC (Each Material)}} + 0.07$$

For each material used.

$$E_{\text{VOC(Each Material)}} = \frac{(A1 \times D1 \times B1)}{2,000}$$

Where:

$E_{\text{VOC (Total)}}$	=	total tons of VOC emissions per month from the facility.
$E_{\text{VOC (Each Material.)}}$	=	total VOC used in tons/accounting period (month)
A#	=	amount of each VOC-containing material used, in gallons/accounting period (month)
D#	=	the density of A# in pounds per gallon
B#	=	weight percent VOC in A#, as a fraction
0.07	=	equates to the monthly VOC potential to emit tons for the miscellaneous insignificant activity sources including, makeup air systems, ovens, heating, fire engine pump, and glue usage

Reporting Requirements

- d. The Permittee shall submit a semi-annual summary report of monitoring and recordkeeping activities given in Section 2.2 A.2.c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12-month rolling average over the previous 17 months.

State-enforceable only

3. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

- a. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

4. 15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT

Permitting [15A NCAC 02Q .0504(c)]

- a. Pursuant to 15A NCAC 02Q .0501(b)(2), the Permittee shall file an application for dry filter-type spray booths and woodworking activities (**ID Nos. ES-1 through ES-10**) and associated control devices (**ID Nos. CD-10 through CD-11**) and all other miscellaneous and/or insignificant activities (**ID No. IES-1 through IES-7**), following the procedures of Section 15A NCAC 02Q .0500, within one year from the date of beginning of operation any of the above sources, based upon whichever source commences operation first.

Reporting [15A NCAC 02Q .0308(a)]

- b. The Permittee shall notify the Regional Office in writing of the beginning of operation of listed sources in Section 2.2 A.4.a above, postmarked no later than 30 days after such date.
- c. The Permittee shall submit to the DAQ sufficient design data for the emissions control systems included in the application for proper evaluation of environmental performance, before commencing construction of any sources. DAQ may require a permit revision, if appropriate, upon its review of the design parameters of these environmental controls.

5. 15A NCAC 02Q .0304(d) and (f): PERMIT RENEWAL REQUIREMENT

- a. The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with application Form A) should be submitted to the Regional Supervisor, DAQ.

6. 15A NCAC 02Q .0207: ANNUAL EMISSION INVENTORY REQUIREMENT

- a. As required by 15A NCAC 02Q .0207 "Annual Emissions Reporting", the Permittee shall report by June 30 of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

SECTION 3 - INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)

Emission Source ID No.	Emission Source Description ^{1,2}
IES-1	Make up air unit 1 (natural gas-fired rated at 5.0 million Btu per hour)
IES-2	Make up air unit 2 (natural gas-fired rated at 5.0 million Btu per hour)
IES-3	Venjakob HVIR Oven (natural gas-fired rated at 0.51 million Btu per hour)
IES-4	Miscellaneous space heaters (natural gas-fired rated at 4 million Btu per hour combined maximum heat input)
IES-5 NSPS IIII MACT ZZZZ	Fire pump emergency engine (diesel-fired rated at 85 horsepower)
IES-6	Diesel fuel tank (100 gallon capacity)
IES-7 MACT JJ	Glue usage (maximum usage 16,230 gallons per year)

¹ Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement (Federal or State) or that the Permittee is exempted from demonstrating compliance with any applicable requirement.

² When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 “Control of Toxic Air Pollutants” or 02Q .0711 “Emission Rates Requiring a Permit.”

SECTION 4 - GENERAL CONDITIONS

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Supervisor
North Carolina Division of Air Quality
Raleigh Regional Office
3800 Barrett Drive
Raleigh, NC 27609
919-791-4200

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 2D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 2Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 2Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. CHANGES NOT REQUIRING PERMIT REVISIONS - Pursuant to 15A NCAC 02Q .0318, changes to the facility that are not exempt pursuant to 15A NCAC 02Q .0102 may be allowed without first modifying an applicable air permit if the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5) and the owner or operator notifies the Director in writing, using forms provided by the Division, seven calendar days before the change is made. Within 10 business days of receipt of the notice, the Division shall notify the owner or operator of its determination of whether the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5).
8. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators

must obtain a new air permit from the DAQ.

9. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
10. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
11. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
13. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
14. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
15. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
16. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 2D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the TBDth day of TBD, 2023.

Mark J. Cuilla, EIT, CPM, Chief, Air Permitting Section
By Authority of the Environmental Management Commission
Air Permit No. 10787R00

c: Laserfiche (4900314)
Connie Horne (cover letter only)