

Application Review

Issue Date: Date needed

Region: Mooresville Regional Office
County: Catawba
NC Facility ID: 1800044
Inspector's Name: Afroze Fatima
Date of Last Inspection: 08/11/2023
Compliance Code: 3 / Compliance - inspection

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| <p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Century Furniture - Plant No. 1</p> <p>Facility Address: Century Furniture - Plant No. 1 420 12th Street NW Hickory, NC 28601</p> <p>SIC: 2511 / Wood Household Furniture NAICS: 337122 / Nonupholstered Wood Household Furniture Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p> | <p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0503, .0504, .0512, .0516, .0521, .0524, .1111, .1806, and 02Q .0317 NSPS: Dc NESHAP: JJ and JJJJJ PSD: NA PSD Avoidance: NA NC Toxics: .0711 112(r): NA Other: NA</p> |
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| Contact Data | | | Application Data |
|---|--|--|--|
| <p style="text-align: center;">Facility Contact</p> Dennis Tart Environmental Engineer (828) 326-8376 PO Box 608 Hickory, NC 28603 | <p style="text-align: center;">Authorized Contact</p> Brandon Mallard Plant Manager (828) 326-8384 PO Box 608 Hickory, NC 28603 | <p style="text-align: center;">Technical Contact</p> Dennis Tart Environmental Engineer (828) 326-8376 PO Box 608 Hickory, NC 28603 | <p>Application Number: 1800044.23A Date Received: 10/09/2023 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03918/T24 Existing Permit Issue Date: 05/20/2019 Existing Permit Expiration Date: 04/30/2024</p> |

Total Actual emissions in TONS/YEAR:

| CY | SO2 | NOX | VOC | CO | PM10 | Total HAP | Largest HAP |
|------|--------|-------|--------|-------|-------|-----------|-------------------|
| 2022 | 0.8700 | 17.57 | 143.56 | 21.30 | 16.17 | 13.51 | 6.72 [Toluene] |
| 2021 | 0.9000 | 18.00 | 152.63 | 21.88 | 17.87 | 14.02 | 7.37 [Toluene] |
| 2020 | 0.8000 | 16.11 | 117.21 | 19.59 | 14.71 | 10.88 | 5.42 [Toluene] |
| 2019 | 0.9700 | 19.42 | 106.50 | 23.64 | 16.59 | 11.18 | 5.24 [Toluene] |
| 2018 | 1.02 | 20.47 | 98.87 | 24.91 | 16.48 | 10.47 | 4.64 [Toluene] |

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| <p>Review Engineer: Jacob Larson</p> <p>Review Engineer's Signature: _____ Date: _____</p> | <p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 03918/T25 Permit Issue Date: Date needed Permit Expiration Date: Date needed</p> |
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1. Purpose of Application

Century Furniture - Plant No. 1 (Century) currently holds Title V Permit No. 03918T24 with an expiration date of April 30, 2024 for a furniture manufacturing facility in Hickory, Catawba County, North Carolina. This permit application is for a permit renewal without modification. The renewal application was received on October 09, 2023 or at least six months prior to the expiration date. 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.

2. Facility Description

The facility manufactures primarily wood furniture and applies stains, lacquers, and other finishing materials per customer requests. In addition to wood furniture, metal furniture items maybe finished as well. Furniture is dried in ovens utilizing steam or natural gas drying systems. Boiler steam is generated for select ovens providing building space heat.

3. History/Background/Application Chronology

History/Background

May 20, 2019 Air Permit No. 06848T09 was issued with an expiration date of April 30, 2024.

Application Chronology

October 09, 2023 DEQ received permit application 1800044.23A for Title V renewal.

October 12, 2023 Sent acknowledgment letter indicating that the application for permit renewal was complete.

April 01, 2024 Draft permit and review forwarded for comments to Permitting Supervisor.

April 10, 2024 Comments received from Mark Cuilla, Permitting Section Chief.

April 17, 2024 Draft permit and review forwarded to the Stationary Compliance Branch for comments. No comment was received April 18, 2024.

April 17, 2024 Draft permit and review forwarded to the Mooresville Regional Office for comments. No comments were received May 06, 2024.

May 06, 2024 Draft permit forwarded to the applicant for comments. No comments were received May 29, 2024.

XXXX xx, 2024 Draft permit and permit review forwarded to public notice.

XXXX xx, 2024 Public comment period ends. ____ comments received.

XXXX xx, 2024 EPA comment period ends. ___ comments received.

XXXX xx, 2024 Permit issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process.

| Pages | Section | Description of Changes |
|-------|-------------------------------------|--|
| -- | Cover page and Throughout | Updated all dates and permit revision numbers. |
| -- | Cover Page | Added “Notice Regarding The Right To Contest A Division of Air Quality Permit Decision” page |
| -- | Summary of Changes to Permit | Added summary of changes made to Permit No. 03918T24 according to the most recent requirements of the renewal Title V permit |
| 2 | Table of Content | Corrected Section 2.2 from Non-Applicable requirements to Multiple emission sources |
| 3 | List of Acronyms | Added “List of Acronyms” |
| 4 | Section 1 Permitted Emissions Table | Removed GACT JJJJJ from emission sources ES-B1NG and ES-B2NG |
| 6 | 2.1 A.4 | Updated NSPS Dc requirements to current regulatory language |
| 7 | 2.1 B.1.c | Updated testing criteria to current regulatory language |
| 8 | 2.1 B.3.c | Updated monitoring requirement to current shell version |
| 8 | 2.1 B.4 | Updated GACT JJJJJ to current regulatory language |
| 9 | 2.1 B.4.g | Changed paragraph structure |
| 12 | 2.1 C.2.c | Updated monitoring requirement to current shell language |
| 14 | 2.1 D.2.d | <ul style="list-style-type: none"> • Updated monitoring requirement to current shell language • Corrected paragraph numbering c-f. |
| 15-18 | 2.2 A | <ul style="list-style-type: none"> • Updated MACT JJ to current shell language |
| 18 | 2.2 B.1 | <ul style="list-style-type: none"> • Removed 112(j) from permit avoidance condition and replaced with MACT avoidance. • Updated to current regulatory language |
| 19 | 2.2 C.1 | Updated TPER table to current shell version |
| 20 | Section 3 | Added Insignificant activities to section 3 |
| 21 | Section 4 | Added General Conditions (version 7.0, 08/21/2023) as Section 4 of the Title V Permit |

This permit renewal is without modification, and no changes to the Title V Equipment Editor are needed.

5. Regulatory Review

Century is subject to the following regulations. The facility’s equipment and operations have not changed since the last renewal in 2019. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

15A NCAC 02D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”

15A NCAC 02D .0504 “Particulates from Wood Burning Indirect Heat Exchangers”

15A NCAC 02D .0512 “Particulates from Miscellaneous Wood Products Finishing Plants”

15A NCAC 02D .0516 “Sulfur Dioxide from Combustion Sources”
 15A NCAC 02D .0521 “Control of Visible Emissions”
 15A NCAC 02D .0524 “New Source Performance Standards”
 15A NCAC 02D .1111 “Maximum Achievable Control Technology” and “Generally Achievable Control Technology” [40 CFR Part 63 Subpart JJ & Subpart JJJJJ]
 15A NCAC 02D .1806 “Control and Prohibition of Odorous Emissions” (State-enforceable only)
 15A NCAC 02Q .0317 “Avoidance Conditions” (for 15A NCAC 02Q .1111)
 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit” (State-enforceable only)

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers - Natural gas-fired boilers ES-B1NG & ES-B2NG are subject to 40 CFR 60, Subpart Dc, but this NSPS does not have a particulate standard for natural gas-fired units. Therefore, these boilers are subject to the 02D .0503 regulation. This regulation limits the allowable amount of particulate emissions (PM) from a boiler as a function of the facility-wide heat input capacity. Once a limit is determined, it will not be revised upwards or downwards if the facility-wide heat input capacity changes. The formula to determine the allowable emission rate is:

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

Where:

- E = The allowable particulate emission rate, in pounds per million Btu heat input
- Q = The facility-wide maximum heat input, in million Btu per hour

The emission factor for natural gas (NG) combustion is 0.007 lbs/million Btu per Table 1.4-2 of US EPA, AP-42. Thus, very little particulate is produced from NG combustion. Therefore, no monitoring, recordkeeping, or reporting (MRR) is required to show compliance with the regulation.

No changes to the permit stipulation are required. Continued compliance is expected.

15A NCAC 02D .0504, Particulates from Wood Burning Indirect Heat Exchangers - The wood fired boiler (ID No. ES-B2) is subject to 02D .0504. Allowable PM emissions are determined from the equation $E = 1.1698(Q)^{-0.2230}$, where E equals the allowable emission limit for PM (in pounds per million Btu) and Q equals the maximum heat input in million Btu per hour. The Q for the wood fired boiler includes 36 million Btu/hr heat input of boiler ES-B1, which has since been removed from the facility. With a Q of 74.4 million Btu per hour ($Q = 36 + 38.4$), the PM emission limit for the wood fired boiler is 0.45 pounds per million Btu.

In addition to inspection and maintenance requirements, Century Furniture is currently required to conduct PM emission testing once per permit term to demonstrate compliance with 02D .0504. The following table summarizes the historical PM emission testing conducted on boiler ES-B2.

| Test Date | PM Emission Rate Measured During Testing (lb/million Btu) | Percent of limit | Allowable Emission Rate (lb/million Btu) |
|------------|---|------------------|--|
| 01/05/2024 | 0.375 | 83.3 | 0.45 |
| 03/14/2018 | 0.334 | 74.2 | |
| 05/19/2010 | 0.397 | 88.2 | |
| 01/14/2010 | 0.42 | 93.3 | |
| 12/03/2009 | 0.57 (NOV) | 126.7 | |
| 04/10/2001 | 0.432 | 96 | |

No changes to this permit are needed under this renewal. Continued compliance is expected.

15A NCAC 02D .0512: Particulates from Miscellaneous Wood Products Finishing Plants -

This regulation requires that facilities provide adequate particulate control for wood finishing processes.

The furniture finishing operation (ID No. SP-1), the wood waste handling and storage system (ID No. S1), wood dust storage bin transfer operations (ID No. WDSBT), wood hog (ID No. S2), wood dust fuel trailer unloading operations (ID No. WDTU), woodworking operation (ID No. S3), and woodworking equipment (ID No. ES-W1) are subject to 02D .0512.

In order to demonstrate compliance, all of the particulate control devices (such as filters and cyclones) must be regularly inspected and maintained. Records of maintenance must be kept and reported twice per year. Continued compliance is expected.

15A NCAC 02D .0516: Sulfur Dioxide from Combustion Sources - This regulation limits SO₂ emissions from combustion sources to 2.3 pounds emitted per million Btu heat input.

The only combustion sources on the permit are the three boilers. Two NG and one wood (Sulfur content in wood is normally less than 0.1 percent) fired; both fuels are inherently low in sulfur; therefore, no monitoring, recordkeeping or reporting is necessary. Continued compliance is expected.

15A NCAC 02D .0521: Control of Visible Emissions - This regulation limits visible emissions (VE).

The following equipment was manufactured and operating as of July 1, 1971 and must not have visible emissions of more than 40 percent opacity when averaged over a six-minute period, except as specified in 15A NCAC 02D .0521(c):

- Spray booths (ID Nos. SP-1-SB-1 through SP-1-SB-28) - To ensure compliance with 02D .0521, the facility is required to conduct monthly visible emission observations.
- Woodwaste handling and storage system (ID No. S1) and wood hog (ID No. S2) and associated controls - To ensure compliance with 02D .0521, the facility is required to conduct weekly visible emission observations.

The following equipment was manufactured after July 1, 1971 and must not have visible emissions of more than 20 percent opacity when averaged over a six-minute period, except as specified in 15A NCAC 02D .0521(d).

- Natural gas-fired boilers (ID Nos. ES-B1NG and ES-B2NG) - No monitoring, recordkeeping, or reporting is required when firing natural gas in these boilers.
- Wood fired boiler (ID No. ES-B2) - To ensure compliance with 02D .0521, the facility is required to conduct daily visible emission observations.
- Spray booths (ID Nos. SP-1-SB-30 through SP-1-SB-32) - To ensure compliance with 02D .0521, the facility is required to conduct monthly visible emission observations.
- Woodwaste handling and storage system (ID No. S1), wood dust storage bin transfer operations (ID No. WDSBT), wood dust fuel trailer unloading operations (ID No. WDTU), woodworking operation (ID No. S3), and woodworking equipment (ID No. ES-W1) - To ensure compliance with 02D .0521, the facility is required to conduct weekly visible emission observations.

No changes to this permit are needed under this renewal. Continued compliance is expected.

15A NCAC 02D .0524, New Source Performance Standards (NSPS) - Century is subject to NSPS Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. More discussion on NSPS is provided below in Section 6.

15A NCAC 02D .1111, Maximum Achievable Control Technology (MACT) - Century is subject to National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, 40 CFR Part 63 Subpart JJ and Area Sources: Industrial, Commercial, and Institutional Boilers, 40 CFR 63, Subpart JJJJJ. More discussion on MACT/GACT is provided below in Section 6.

15 NCAC 02D .1806, Control and Prohibition of Odorous Emissions (State-enforceable only condition) - 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. Continued compliance is anticipated.

15A NCAC 02Q .0317, Avoidance Condition for 15A NCAC 02D .1111 – The facility has accepted a permit limit on HAP emissions to avoid being considered a major source in accordance with 15A NCAC 02D .1111. The facility is limited to 10 tons per year of each hazardous air pollutant, and 25 tons per year of all hazardous air pollutants combined. The facility must monitor and record consumption of materials containing HAP from finishing operation, fuel consumption, and quantity of HAPs emitted by facility. The facility is subject to semiannual reporting of HAPs emitted. Continued compliance is anticipated.

15A NCAC 02Q .0711, Emission Rates Requiring a Permit- The facility has no 02D .1100 limits in their permit. However, their permit contains a 02Q .0711 condition for ammonia and n-hexane as discussed in Section 7 below.

6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

Subpart Dc

Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The two natural gas-fired boilers (ID Nos. ES-B1NG and ES-B2NG) are permitted at 16.738 million Btu/hr; thus, subject to 40 CFR Part 60, NSPS, Subpart Dc. However, Subpart Dc does not specify an emission limit for natural gas-fired sources; therefore, the facility is only required to keep fuel records. Per 40 CFR 60.48c(g), the facility must record and maintain records of the amounts of each fuel combusted during each month for the boilers. The records must be maintained on-site for a period of two years. Additionally, the facility must submit the fuel usage records for each six-month period within 30 days after the end of each period. Continued compliance is anticipated.

NESHAP/MACT/GACT

Century was formerly classified as a major source for hazardous air pollutants (HAP), subject to the Wood Furniture MACT (40 CFR 63 Subpart JJ) and the Industrial, Commercial, and Industrial Boilers and process Heaters MACT, (40 CFR 63 Subpart DDDDD). The US EPA finalized amendments on January 19, 2021 to the General Provisions that apply to National Emission Standards for Hazardous Air Pollutants (NESHAP). These amendments implement the plain language reading of the “major source” and “area source” definitions of section 112 of the Clean Air Act (CAA) and provide that a major source can be reclassified to area source status at any time upon reducing its potential to emit (PTE) hazardous air pollutants (HAP) to below the major source

thresholds of 10 tons per year (tpy) of any single HAP and 25 tpy of any combination of HAP. This rule also finalizes amendments to clarify the compliance dates, notification, and recordkeeping requirements that apply to sources choosing to reclassify to area source status and to sources that revert back to major source status, including a requirement for electronic notification. This final rule became effective on January 19, 2021.

This facility contains a MACT avoidance condition which was initially permitted in Air Permit No. 03918T21 to become an area source for HAPs. Currently classified as an area source, Century is subject to the Boiler GACT (40 CFR 63, Subpart JJJJJJ). However, the facility has chosen to continue to comply with the Furniture MACT, Subpart JJ and the permit will be renewed as written. The DAQ will notify the facility that the “Once in Always in” policy has been changed and the MACT Subpart JJ condition can be (if elected) removed from the Title V permit. However, removal of the MACT JJ requirements from the permit would cause the facility to be subject to state Air Toxics regulations in accordance with 15A NCAC 02Q .0711.

MACT JJ

NESHAP for Wood Furniture Manufacturing Operations, 40 CFR Part 63 Subpart JJ. Century has chosen to comply with this MACT using a combination of the averaging method (i.e., by working to achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings used) and compliant coatings method (using finishing materials containing less than or equal to a maximum VHAP content). The facility is required to submit a semi-annual report which certifies their operation. Semi-annual reports received on July 25, 2023 and January 25, 2024 appeared to show compliance. Facility emission sources subject to this rule listed below.

Parts line natural gas drying oven (ID No. I-PL-1), wash off tank (ID No. I-WOT-1), and one furniture finishing operation (ID No. SP-1) consisting of:

- sixteen water pan-type spray booths (Nos. SB-1 through SB-12, SB-14, SB-15, SB-17, and SB-18)
 - eleven baffle-type spray booth (Nos. SB-13, and SB-19 through SB-28)
 - four dry filter-type spray booth (Nos. SB-16 and SB-30 through SB-32)
 - ten gluing operations - roll coaters (Nos. ES-G5.1 through ES-G5.10)
 - seven indirect-fired drying ovens (Nos. ES-SP2.1 through ES-SP2.7)
- *Except for the baffle-type spray booth (ID No. SP-1-SB-21) which is not affected by 40 CFR 63, Subpart JJ pursuant to 40 CFR 63.800(c), which provides an exemption for “research and laboratory facilities.

GACT JJJJJ

The facility is subject to the National Emission Standards of Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources, in accordance with 40 CFR Part 63 Subpart for the wood fired boiler (ID No. ES-B2). This facility has taken a HAP avoidance condition, which is listed in the Title V permit, to avoid being a major source of HAPs. The permittee must perform a tune up on the boiler biannually. The initial tune up and one time energy assessment was performed in October 2013 and submitted initial notice of compliance on July 16, 2013. Records must be maintained of each energy assessment and tune-up.

Natural gas fired boilers (ID. Nos. ES-B1NG and ES-B2NG) are not subject to GACT JJJJJ. The GACT JJJJJ requirement will be removed from these sources as a result of this renewal.

PSD

Century is classified as a minor facility under PSD. This permit renewal does not affect this status.

112(r)

The facility 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 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit renewal.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g. pre-November 15, 1990, Section 111, or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

None of the sources at the facility have precontrolled emissions greater than 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs. Therefore, the facility is not subject to CAM and this renewal does not change the applicability of this rule.

7. Facility Wide Air Toxics

Century's primary operations are wood furniture manufacturing and combustion sources, which are exempt per 15A NCAC 02Q .0702 EXEMPTIONS (a)(18), (23) and (27), as toxics emission sources because they are subject to MACT/GACT Subpart JJ, Subpart JJJJJ and NSPS Subpart Dc.

During a previous renewal (issued permit T22), emissions of ammonia and n-hexane were compared against their respective toxic permitting emissions rate (TPER). Neither TAP exceeds its TPER; however, a condition was added to the permit at that time specifying that a permit to emit n-hexane and ammonia in quantities above the TPER requires the submittal of a permit application pursuant to 15A NCAC 02Q .0700.

| Pollutant | CAS No. | Carcinogens (lb/yr) | Chronic Toxicant (lb/day) | Acute Systemic Toxicants (lb/hr) | Acute Irritants (lb/hr) |
|------------------|----------------|--------------------------------|--|---|--|
| Ammonia | 7664-41-7 | | | | 0.68 |
| n-Hexane | 110-54-3 | | 23 | | |

This permit renewal does not affect this status.

8. Facility Emissions Review

The facility-wide potential emissions do not change under this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the years 2018 through 2022 are provided in the header of this permit review.

9. Compliance Status

DAQ has reviewed the compliance status of Century Furniture Plant 1. During the most recent inspection, conducted on August 11, 2023 by Afroze Fatima of MRO, the facility appeared to be in compliance with all applicable requirements. Further, the facility has had no air quality violations within the last five years. The facility's Annual Compliance Certification was received on January 25, 2024 and indicated compliance with all applicable requirements in 2023.

10. 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 .0525, the EPA will have a concurrent 45-day review period. 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 provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.

11. Other Regulatory Considerations

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.
- EPA has promulgated a rule (88 FR 47029, July 21, 2023), with an effective date of August 21, 2023, removing the emergency affirmative defense provisions in operating permits programs, codified in both 40 CFR 70.6(g) and 71.6(g). EPA has concluded that these provisions are inconsistent with the EPA's current interpretation of the enforcement structure of the CAA, in light of prior court decisions¹. Moreover, per EPA, the removal of these provisions is also consistent with other recent EPA actions involving affirmative defenses² and will harmonize the EPA's treatment of affirmative defenses across different CAA programs.

As a consequence of this EPA action to remove these provisions from 40 CFR 70.6(g), it will be necessary for states and local agencies that have adopted similar affirmative defense provisions in their Part 70 operating permit programs to revise their Part 70 programs (regulations) to remove these provisions. In addition, individual operating permits that contain Title V affirmative defenses based on 40 CFR 70.6(g) or similar state regulations will need to be revised.

Regarding NCDAQ, it has not adopted these discretionary affirmative defense provisions in its Title V regulations (15A NCAC 02Q .0500). Instead, DAQ has chosen to include them directly in individual Title V permits as General Condition (GC) J.

¹ NRDC v. EPA, 749 F.3d 1055 (D.C. Cir. 2014).

² In newly issued and revised New Source Performance Standards (NSPS), emission guidelines for existing sources, and NESHAP regulations, the EPA has either omitted new affirmative defense provisions or removed existing affirmative defense provisions. See, e.g., National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Final Rule, 80 FR 44771 (July 27, 2015); National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Final Rule, 80 FR 72789 (November 20, 2015); Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units; Final Rule, 81 FR 40956 (June 23, 2016).

Per EPA, DAQ is required to promptly remove such impermissible provisions, as stated above, from individual Title V permits, after August 21, 2023, through normal course of permit issuance.

12. Recommendations

The permit renewal application for Century Furniture- Plant No. 1. located in Hickory, Catawba County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined 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. 03918T25.