

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Bassett Furniture Industries, Inc. - BFI Bassett
2611 Fairystone Park Highway, Bassett, Virginia
Permit No. BRRO-30284

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9VAC5 Chapter 80, Bassett Furniture Industries, Inc. – BFI Bassett has applied for a Title V Operating Permit for its Bassett, Virginia facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: _____
Lillian Alexander
540/562-6783

Date:

Air Permit Manager: _____
David J. Brown

Date:

Regional Director: _____
Robert J. Weld

Date:

FACILITY INFORMATION

Permittee

Bassett Furniture Industries, Inc.
P.O. Box 626
Bassett VA 24055

Facility

BFI Bassett
2611 Fairystone Park Highway
Bassett VA 24055

County-Plant Identification Number: 51- 089-0033

SOURCE DESCRIPTION

NAICS Code: 337122 – Non-upholstered Wood Household Furniture Manufacturing

BFI Bassett (formerly Bassett Table Company and Superior Lines)

This facility has shut down the majority of its manufacturing operations – boilers, woodworking and drying kilns. The only manufacturing equipment remaining at the plant is five spray booths (SB-13 through SB-17). SB-13 is left from the old plant and SB-14 through SB-17 were added in 2014. All five booths are covered by a minor NSR permit dated November 14, 2014.

The facility is a Title V major source of no listed criteria pollutants. It is major for HAPs. The facility is subject to the Wood Furniture MACT (JJ). This source is located in an attainment area for all pollutants and is a PSD minor source.

The facility's original Title V operating permit was issued on February 1, 2002 and was renewed on March 14, 2012. This is the third renewal. The applicant did not submit the renewal application six months prior to the current Title V permit's expiration (March 13, 2017) consequently there is no application shield.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on April 6, 2016. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Furniture Finishing Equipment – Subject to 9VAC5 Chapter 40 (Existing)							
SB-13	SB-13	Spray booth	0.23 gal./min	Dry filters	CD-13	PM, PM10, PM2.5	November 14, 2014
SB-14	SB-14	Spray booth	0.23 gal./min	Dry filters	CD-14	PM, PM10, PM2.5	November 14, 2014
SB-15	SB-15	Spray booth	0.23 gal./min	Dry filters	CD-15	PM, PM10, PM2.5	November 14, 2014
SB-16	SB-16	Spray booth	0.23 gal./min	Dry filters	CD-16	PM, PM10, PM2.5	November 14, 2014
SB-17	SB-17	Spray booth	0.23 gal./min	Dry filters	CD-17	PM, PM10, PM2.5	November 14, 2014

EMISSIONS INVENTORY

Emissions as reported for 2015 (annual emission update) are summarized in the following table:

	2015 Pollutant Emission in Tons/Year					
	VOC	PM	PM10	PM2.5	Toluene	Xylenes
Total	26.70	0.11	0.11	0.11	1.10	0.29

EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at the facility that are subject to Title V permitting. These requirements come from applicable federal requirements. The conditions are not repeated verbatim from the permit. The regulatory authority for each condition is listed in parentheses () below each condition in the permit.

SPRAY BOOTHS (SB-13 through SB-17)

The five spray booths are subject to the requirements of 40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations. Bassett has elected to comply with the MACT by using compliant coatings or VHAP averaging. The permit includes all applicable requirements for these compliance alternatives to Subpart JJ. The spray booths are also subject to the requirements of the minor NSR permit dated November 14, 2014. Particulate emissions from the spray booths are controlled by dry filters. The pre-control emissions for PM, PM10 and PM2.5 are less than major source threshold (100 TPY) so CAM does not apply.

Limitations

Condition 1 – Particulate emissions from each spray booth are controlled by dry filters.

Condition 2 – Visible emissions from each spray booth is limited to five percent opacity.

Condition 3 – Each spray booth is limited to 0.005 gr/dscf of PM, PM10 and PM2.5.

Condition 4 – VOC emissions from all five spray booths is limited to 99 tons per year.

Monitoring

Conditions 5 and 6 – Each spray booth will have a device to measure differential pressure drop across the dry filter and a pressure drop reading will be recorded at least once per shift.

Condition 7 - The source is required to train operators and maintain records of all required training. The source is also required to have written operating procedures and a maintenance schedule for the air pollution control equipment.

Condition 8 - The source is required to conduct daily visible emission evaluations on each spray booth stack. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.

Condition 9 – The facility is required to be constructed to allow for emissions testing.

The monitoring and recordkeeping included in this section meet permit content obligations at 9VAC5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

Recordkeeping

Condition 10 - The source is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the permit. These records include monthly and annual VOC emissions from the spray booths, CPDS and/or MSDS for each coating, operation and control device monitoring, maintenance and operator training, and daily visual observations.

MACT SUBPART JJ – WOOD FURNITURE MANUFACTURING OPERATIONS

The five spray booths are subject to the requirements of 40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations as an existing source (commenced construction before the December 7, 1995 MACT applicability date). The permit includes all applicable requirements of Subpart JJ. Subpart JJ was revised on November 21, 2011. Revisions for wood furniture manufacturing operations include a 1 percent formaldehyde coating and contact adhesive limit and an alternative 400 pound per 12-month formaldehyde use limit as well as a prohibition on the use of conventional spray guns. The effective date for these requirements is 3 years from the effective date of the standards (November 21, 2014).

Condition 11 – The facility is to be operated in compliance with Federal Requirements under 40 CFR 63 Subpart JJ.

Emission Standard

Condition 12 - Emission limitations for Volatile Hazardous Air Pollutants (VHAP) include a weighted average VHAP content limit, the requirement to use compliant finishing materials, cleaning operations strippable spray booth coating limits, compliant contact adhesives and formaldehyde limits.

Continuous Compliance

Condition 13 – The source is required to show continuous compliance with the VHAP emission limits.

Testing

Condition 14 – Any testing shall be conducted using test methods and procedures specified in 40 CFR 63.805 of Subpart JJ.

Submittals

Condition 15 – All submittals regarding Subpart JJ will be sent to EPA and DEQ.

Operations and Maintenance

Condition 16 - The source is required to meet operational and maintenance requirements including operating and maintaining the facility in a manner consistent with good air pollution control practices for minimizing emissions and correcting malfunctions as soon as practicable.

Work Practice Standards

Condition 17 - The source is required to develop and implement the work practice standards outlined in the permit including the following: Work Practice Implementation Plan, Operator Training Course, Inspection and Maintenance Plan, Cleaning and Washoff Solvent Accounting System, Chemical Composition of Cleaning and Washoff Solvents limits, Spray Booth Cleaning, Storage Requirements, Application Equipment Requirements, Line Cleaning, Gun Cleaning, Washoff Operations and Formulation Assessment Plan for Finishing Operations.

Recordkeeping

Condition 18 - The source is required to maintain records for emission limit purposes, calculations, the work practice implementation plan, compliance certifications, records associated with the compliance status reports and semiannual reports.

Notification and Compliance

Condition 19 - The source is required to submit notifications of compliance that are signed by a responsible official and the notification is required to include the methods that were used to determine compliance, the results of all performance tests, the methods used for determining continuing compliance, the type and quantity of hazardous air pollutants emitted, an analysis demonstrating whether the facility is a major source or an area source and a statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in the permit.

Reporting

Condition 20 - The source is required to submit reports demonstrating continuous compliance and any exceedance of a baseline level.

STREAMLINED REQUIREMENTS

The following conditions in the November 14, 2014 minor NSR permit have not been included in the Title V permit for the stated reasons:

Conditions 9 and 10 are no longer applicable since the permitted equipment has been installed and appropriate notifications sent.

Conditions 11 (T5-54), 12 (T5-47), 14 (T5-34), 15 (T5-34), 17 (T5-52) and 18 (T5-50) of the November 14, 2014 minor NSR permit have been streamlined. The requirements contained in these conditions are included in the General Conditions section of the Title V permit.

INSIGNIFICANT EMISSIONS UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
1-6	propane space heaters	9VAC5-80-720C	--	250,000 Btu/hr each

COMPLIANCE PLAN

This facility is not subject to a compliance plan.

INAPPLICABLE REQUIREMENTS

The Plywood and Composite Wood Products MACT (Subpart DDDD) no longer applies since all gluing operations have ceased and equipment subject to this MACT has been removed from the facility.

No inapplicable requirements were identified by the applicant.

There are no applicable GHG permitting requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Federal Enforceability

Article 1 (9VAC5-80-110 N) states that all terms and conditions in the Title V permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

Permit Expiration

These conditions refer to the Board taking action on a permit application. The “Board” refers to the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

Failure/Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. A facility may make a single report that meets the requirements of 9VAC5-20-180. The report must be made within four daytime business hours of discovery of the malfunction.

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS

There are no State Only applicable requirements.

FUTURE APPLICABLE REQUIREMENTS

There are no future applicable requirements.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The draft permit was placed on public notice in the Martinsville Bulletin from November 18, 2016 to December 19, 2016. No comments were received from the public.

The draft/proposed permit was sent to EPA for concurrent review on November 18, 2016. Comments were received on November 22, 2016 and addressed to EPA's satisfaction.