

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Bassett Furniture Industries, Inc. - Plant 11
747 Beaver Creek Drive Martinsville, Virginia
Permit No. BRRO-31013

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 9 VAC 5 Chapter 80, Bassett Furniture Industries Inc., has applied for a significant modification of their Title V Operating Permit for its Martinsville, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: Margaret O. Wagner Date: July 17, 2017
Margaret O. Wagner
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Air Permit Manager: Paul R. Jenkins Date: July 17, 2017
Paul R. Jenkins

Regional Director: Robert J. Weld Date: July 18, 2017
Robert J. Weld

FACILITY INFORMATION

Permittee

Bassett Furniture Industries, Inc. – Plant 11
P.O. Box 626
Bassett, VA 24055

Facility

Bassett Furniture Industries, Inc. – Plant 11
747 Beaver Creek Drive
Martinsville, VA 24112

County-Plant Identification Number: 51-089-00116

SOURCE DESCRIPTION

NAICS Code: 337122 – Non-upholstered Wood Household Furniture Manufacturing
SIC Code: 2511 – Wood Household Furniture Manufacturing

The facility is a wood household furniture manufacturer of primarily tables and chairs with the following processes: Woodworking Operations (T-WW1 and T-WW2), Assembly Operations (T-WW3) and Finishing (T-FW1). The facility is a Title V major source for VOC and hazardous air pollutants (HAPS). Combined HAPs exceed 25 tpy, with at least one individual HAP exceeding 10 tpy (i.e., xylene). The facility has one underlying state NSR permit dated July 18, 2017 and the conditions are included in the current Title V permit.

SIGNIFICANT MODIFICATION INFORMATION

The former Minor NSR permit (6/8/2004) for the wood and wood composite table manufacturing facility was superseded with a Minor NSR permit dated July 18, 2017 for a project to modify the finishing room which would increase the manufacturing rate of tables and chairs from 138 per hour to 150 per hour. The purpose of this current significant modification of BFI's Title V permit is to incorporate the 2017 Minor NSR permit changes into the set of applicable requirements for the facility. Except as described below, the current set of applicable requirements for the BFI facility remain as set forth in the current Title V permit (i.e., Effective date 12/11/13)

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. 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 have been updated with this significant modification and are listed in the Title V permit on pages 4 and 5 and the insignificant emission units listed on page 26.

EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2015 Actual Emissions

	2015 Criteria Pollutant Emission in Tons/Year					
Pollutant	VOC	CO	SO ₂	PM ₁₀	NO _x	HAPs
Total	149.83	0.16	2.7	0.70	0.64	16.93

EMISSION UNIT APPLICABLE REQUIREMENTS -

The following section discusses requirements for the modified emissions units at the facility that are subject to Title V permitting. These requirements come from the Minor NSR permit dated July 18, 2017 for the wood furniture manufacturing facility. 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.

General:

- On 11/7/12, a set of amendments to Virginia’s Minor NSR program became effective. Those amendments included a new section 9VAC5-80-1255, “Actions to combine permit terms and conditions.” Because of the requirements of that section, it became important to distinguish between “permit approvals” and the “permit documents” in which such approvals are housed. Therefore, in the citations of the current Title V permit, the nomenclature “X/Y/ZZ Permit” is changed to “X/Y/ZZ Permit Document”.

Process Equipment Requirements - Woodworking (T-WW1, T-WW2, H112 and H113)

All of the condition numbers from the Minor NSR were updated to reflect the date of the current permit document (July 18, 2017). No other changes were made to these permit requirements with this significant modification.

Process Equipment Requirements - Spray Booths (F100, F102, F104, F106, F108, F109, F111, F113 and F120), Ovens (F101, F103, F105, F107 and F115), Roll Coater Line (H103), Washoff Tank (F114) and T-WW3 (Assembly)

Process equipment unit reference numbers were updated to reflect the permit modification application and all of the condition numbers from the Minor NSR were updated to reflect the date of the current permit document (July 18, 2017). The following changes to applicable requirements for the equipment listed above are carried forward from the July 18, 2017 Minor NSR permit into the Title V permit:

Limitations for F100, F102, F104, F106, F108, F109, F111, F113 and F120:

Condition 9: particulate emissions from the finishing spray booths

Formerly the permit required that the filter media for the finishing line spray booths have a minimum control efficiency of 95%. This significant modification requires filter media that has a minimum control efficiency of 98%.

Condition 12: emission limits

The previously permitted emission limits were updated to reflect the increase of pollutants related to the increase in table and chair production. This change is consistent with the minor NSR permit. PM_{2.5} emissions were also added which is consistent with the minor NSR permit. PM, PM₁₀ and PM_{2.5} lb/hr emissions increased from 1.0 lb/hr to 1.4 lb/hr. The tpy limit increased from 1.3 tpy to 1.5 tpy. VOC lb/hr emissions increased from 206 to 248 lbs/hr. The tpy limit remains the same at 248 tpy.

Monitoring for F100, F102, F104, F106, F108, F109, F111, F113 and F120: No changes beyond those discussed in the "General" section above.

Recordkeeping for F100, F102, F104, F106, F108, F109, F111, F113 and F120:

Condition 15.a:

The monthly and annual material balance requirements has been updated to be consistent with the minor NSR and now includes PM and PM_{2.5} emissions.

Condition 15.d:

The requirement to track the daily record of the number of hours of operation for the finishing line spray booths was amended to include the number of hours of operation of the washoff tank.

Condition 15.g.:

Recordkeeping requirements for the documentation of each type of particulate control for the spray booth filters have been modified to be consistent with the minor NSR permit. Paper filter and water curtain have been removed as neither are used. Styrene filter has been added with the requirement that it achieve a 98% control efficiency (minimum).

Condition 15.h.:

Recordkeeping requirement requiring that the facility maintain MSDS or other vendor

information showing VOC content, toxic compound content, HAP content, water content, solids content for each coating, adhesive, thinner, cleaning solution or other VOC containing material used at the permitted wood household furniture manufacturing facility has been added to the TV permit to be consistent with the underlying NSR permit..

Condition 15.i.:

A recordkeeping requirement for the facility to maintain records of the differential pressure monitoring device(s) reading for the spray booths has been added to the TV permit. This condition was included in the underlying NSR permit.

Other consideration on recordkeeping

Included in the mNSR permit issued on June 8, 2004 was a recordkeeping requirement to maintain records of the monthly and annual throughput of the number of square feet of wood table tops to the wood and wood composite table manufacturing facility (condition 17.c. of the June 8, 2004 permit). This condition dated back to the original permit to construct and operate a wood and wood composite manufacturing facility issued on November 4, 1998 and has been carried forward with each mNSR permit amendment/approval. The original permit was for woodworking equipment and two boilers. The wood working operations included gluing and this recordkeeping requirement served as a mechanism for tracking how much glue was used. Emissions from gluing operations were tracked at a rate of 0.25 lb/table produced. However, once finishing operations were added to the facility (mNSR permit issued on April 9, 1999), the facility was subject to the requirements of 40 CFR 63, Subpart JJ – the Wood Furniture MACT and gluing operations were covered with the MACT requirements. The requirement to maintain records for the number of square feet of wood table tops is no longer necessary as emissions limitations are no longer based on the throughput of tabletops. This recordkeeping requirement was removed from the mNSR permit during this concurrent permit modification.

Wood Furniture MACT (40 CFR 63 Subpart JJ)

The facility is a major source of HAPs and is a new source as defined by 40 CFR 63 Subpart JJ. The Title V permit includes applicable requirements of Subpart JJ, including the 11/21/11 amendment to the regulation. The content and language of the MACT is identical to the last Title V permit renewal (12/11/13). A footnote was added to the continuous compliance section indicating the facility does not have a control system but would have to comply with additional MACT requirements in the event a control system was installed.

FACILITY WIDE CONDITIONS

No changes beyond those discussed in the “General” section above

INSIGNIFICANT EMISSION UNITS (No changes due to the current significant modification.)

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 9 VAC 5-80-110. Insignificant emission units are included in Condition 29. of the T5 permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 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

32. through 37. Permit Expiration (No changes due to the current significant modification.) These conditions refer to the Board taking action on a permit application. The Board is 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”.

43. Failure/Malfunction Reporting (Language updated to be consistent with DEQ boilerplate on malfunctions.)

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

68. Asbestos Requirements (No changes due to the current significant modification.)

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

None (No changes due to the current significant modification.)

INAPPLICABLE REQUIREMENTS

None identified. (No changes due to the current significant modification.)

COMPLIANCE PLAN

None (No changes due to the current significant modification.)

CONFIDENTIAL INFORMATION (No changes due to the current significant modification.)

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

PUBLIC PARTICIPATION

The draft/proposed permit was placed on public notice in the *Martinsville Bulletin* from 04/17/17 to 05/17/17. This draft permit was sequentially reviewed as a proposed permit by the EPA with an end of review date of 07/17/17.