

May 2007

## Getting in Touch with Air Pollution Requirements for Wood Furniture Manufacturing

### Are there air pollution regulations established specifically for wood furniture manufacturing?

In 1995, the U.S. Environmental Protection Agency finalized a regulation known as the National Emission Standards for Hazardous Air Pollutants (NESHAP) to control air emissions from wood furniture manufacturers in 40 CFR 63 Subpart JJ. This regulation affects wood furniture manufacturers that perform surface coating operations and are classified as “major sources” due to their emission levels of hazardous air pollutants (HAPs). HAPs are emitted during the application or use of paints, lacquers, stains, solvents, glues, etc. in the wood furniture manufacturing process. For a source to be classified as a “major source” and therefore fall under the NESHAP, it must have a potential to emit more than 10 tons of any one HAP or more than 25 tons of all HAPs combined. Common HAPs often found in the coatings used in wood finishing operations include toluene, xylene, and methylene chloride.

If a company’s emissions cause it to fall under the NESHAP, then it will be required to comply with the rules set forth in the regulation. The regulation primarily addresses the HAP emissions by introducing limits for the HAP content of the coatings. Therefore, any source which is governed by the NESHAP may have to switch the coatings it uses to a lower HAP coating. The regulation also sets forth a listing of proper work practices to be adhered to by the operators of the source.

A company falling under the NESHAP will be required to submit an initial notification of intent to comply to both Ohio EPA and to the U.S. EPA regional office in Chicago. If the woodworking operation is a newly installed source, the company must also be sure to meet air pollution permit requirements. The compliance deadlines are as follows:

- December 7, 1995 or upon startup, if you are a source whose construction or reconstruction commenced after December 6, 1994.
- November 21, 1997, if you are an existing source who actually emitted 50 tons or more of HAPs during 1996.
- December 7, 1998, if you are an existing source who actually emitted less than 50 tons of HAPs during 1996.

For further information on the wood furniture regulation and on obtaining and filling out a Title V permit, please contact Ohio EPA’s Division of Air Pollution Control at (614) 644-2270.

### Is there a way a company can prove they are not a “major source” and therefore are not subject to the NESHAP?

Yes, you may demonstrate your company is an “area source”. To qualify as an area source, at least 90 percent of annual HAP emissions from the plant site must come from finishing materials, adhesives, cleaning solvents, and washoff solvents.



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Two basic options are available to demonstrate you are an area source:

## 1. Material use option:

- Use less than 250 gallons of all materials\* per month, every month. A company using this option must maintain records of the total gallons of materials used each month; or
- Use less than 3,000 gallons of all materials\* per rolling, 12-month period. A company using this option must maintain records of the total gallons of materials used each month and the total gallons used during the previous 11 months; or
- Use materials\* containing no more than five tons of any one HAP or 12.5 tons of all HAPs per rolling, 12-month period. A company using this option must maintain records of the total gallons of materials used each month; certified product data sheets (CPDS) for these materials; and any other records necessary to document emissions from operations other than wood furniture manufacturing.

\* *materials* includes coating, gluing, cleaning and washoff materials.

## 2. “Synthetic minor” air pollution permit:

This involves obtaining an air pollution permit that limits your total annual plant-wide emissions to less than 10 tons of a single HAP and less than 25 tons of combined HAPs. Contact your local air pollution permitting office for more information.

### **If a company shows that it is not subject to the NESHAP, will it still need air pollution permits?**

It is likely that a company that performs wood furniture manufacturing would still need air pollution permits even if it is not a “major source”. Most often, wood furniture manufacturers require air pollution permits for both the coating operation (painting, staining and cleanup) and the woodworking (sawing, planing, sanding, etc.). As noted above, the coating (or gluing) operation is a source of HAPS and volatile organic compounds (VOCs). The woodworking operations are a source of particulate matter (dust).

### **Is there anywhere I can get help with determining my status and/or filling out permit applications?**

If you have questions or need help in understanding Ohio EPA's regulations, you can contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help. OCAPP is a non-regulatory office of Ohio EPA with a goal of helping small businesses comply with environmental regulations and permitting requirements. If you are operating a small business with fewer than 100 employees, we can help you! For more information, contact OCAPP at (800) 329-7518, or visit our Web site at [www.epa.state.oh.us/ocapp/sb](http://www.epa.state.oh.us/ocapp/sb).



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## OhioEPA District Offices



Toll-free numbers are for citizens with questions or concerns about environmental issues. The regulated community should use the business line for routine business. Spills and emergencies should be reported to (800) 282-9378.

**CDO Central District Office**  
50 W. Town St. Suite 700  
Columbus, OH 43215  
(614) 728-3778  
(614) 728-3898 Fax  
(800) 686-2330  
[www.epa.state.oh.us/cdo](http://www.epa.state.oh.us/cdo)

**NWDO Northwest District Office**  
347 N. Dunbridge Rd.  
Bowling Green, OH 43402  
(419) 352-8461  
(419) 352-8468 Fax  
(800) 686-6930  
[www.epa.state.oh.us/nwdo](http://www.epa.state.oh.us/nwdo)

**SEDO Southeast District Office**  
2195 Front St.  
Logan, OH 43138  
(740) 385-8501  
(740) 3856490 Fax  
(800) 686-7330  
[www.epa.state.oh.us/sedo](http://www.epa.state.oh.us/sedo)

**NEDO Northeast District Office**  
2110 E. Auroa Rd.  
Twinsburg, OH 44087  
(330) 963-1200  
(330) 487-0769 Fax  
(800) 686-6330  
[www.epa.state.oh.us/nedo](http://www.epa.state.oh.us/nedo)

**SWDO Southwest District Office**  
401 E. Fifth St.  
Dayton, OH 45402-6357  
(937) 285-6357  
(937) 285-6249 Fax  
(800) 686-6357  
<http://swdoweb.epa.state.oh.us>