

Wood Furniture Manufacturers National Emission Standards for Hazardous Air Pollutants Area Sources



DO I NEED TO BE CONCERNED ABOUT THIS?

The Federal Government has established a national standard that applies to businesses that manufactures wood furniture and wood furniture components. Businesses subject to this Standard are those engaged in part or in whole in the manufacturing of wood furniture or wood furniture components and emit, or have the Potential To Emit (PTE) Hazardous Air Pollutants (HAPs) of 10 or more tons per year of a single HAP or a total of 25 tons (or more) per year of a combination of HAPs. The specific HAPs that are of concern are listed in the Standard's **Table 2** (attached). Those businesses with a Standard Industrial Code (SIC) of 2434, 2511, 2512, 517, 2519, 2521, 2531, 2541, 2599 and 5712 should examine this issue, it may apply.

Businesses whose actual emissions or potential emissions meet the thresholds are classified as **MAJOR sources**. These sources are subject to the Standard's requirements. Potential to emit may be calculated based on the application rate of the facility's spray gun when run continuously. Using this method of calculating PTE, all sources have a PTE equal to 10/25 tons per year and are major sources.

However, a business may be treated as a **minor source** if it fits one of the following **alternatives** contained in the Federal Standard. A business that meets these alternatives are not subject to the Standard. If the alternatives are exceeded, major source requirements would apply. Record keeping must be maintained to demonstrate compliance with the alternative. Construction (Emission) Permit requirements apply to any source exceeding permitting thresholds for criteria (VOC) pollutants.

1. Incidental wood furniture manufacturer (primarily engaged in the manufacturing of products other than wood furniture) that uses no more than 100 gallons per month of finishing materials and adhesives in the manufacturing of wood furniture.
2. Use of less than 250 gallons per month (or less than 3,000 gallons per rolling 12 month period) of coating, gluing, cleaning and washoff materials, including materials used for operations other than wood furniture manufacturing. An additional criteria that must be met for this exemption to apply is that the use of these materials must account for at

least 90 % of all HAP emissions at the facility.

3. Emissions of less than 5 tons per rolling 12 month period of any one HAP and no more than 12.5 tons per rolling 12 month period of any combination of HAPs, AND at least 90 % of the plant wide HAP emissions are associated with the manufacture of wood furniture.

Use of pollution prevention (P2) techniques can reduce emissions. These techniques include changing to low solvent or non solvent based coatings, or going to HVLP spray guns, air assisted airless guns and flatline continuous coating systems. Often, they can be cost effective, provide a healthier work environment and make good business sense. The cost savings seen from using pollution prevention techniques are apparent in reducing the amount of materials being used and waste being sent out. In some cases, a business can reduce emissions to a point where an Emission Permit is not necessary. We have attached some non-mandatory P2 tips for your consideration. **Please see the attached Pollution Prevention Tool Kit for Wood Products.**

Basic process to determine HAP emissions

Collect the Material Safety Data Sheets (MSDS) or Certified Product Data Sheet (CPDS) for the products used: finish materials, stains, surface coatings, top coats, base coats, adhesives, cleaning solvents, thinners and reducers.

Check the Hazardous Ingredient Section of the MSDS/CPDS for each product for ingredients listed in the Standards Table 2. List the contents common to the MSDS/CPDS and Table 2 for percent weight of this material. If several MSDS/CPDS of a group of materials (i.e. stains) are basically the same or similar, collect the data for one. If the ingredients vary slightly from one MSDS/CPDS to another within a group, you may consider using the data from the MSDS/CPDS from the product with the highest HAP content level for all materials used within the group.

Check the MSDS/CPDS for the Density or Specific Gravity of the product. If Specific Gravity is provided rather than density, convert specific gravity to density by multiplying the specific gravity by the density of water (8.34 lb/gal).

Determine the amount of each material (or group) used on an annual basis.

Multiply the annual usage of materials (or group) times the material density times the percent weight of each HAP found common to Table 2 and the material's MSDS/CPDS.

Gallons used X weight of a gallon (Density) X % weight of the HAP = pounds HAP

