

An Update on the Wood Furniture MACT

AM-480 2009

On December 7, 1995, the U.S. Environmental Protection Agency (EPA) issued a rule that would limit the emissions of hazardous air pollutants (HAPs) from new and existing wood furniture manufacturing operations. These are nationwide standards intended to protect the public by requiring the control of HAP emissions through the use of maximum achievable control technology (MACT).

Who is Affected?

This MACT standard applies to major sources engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components.

Wood furniture means any product manufactured under any of the following Standard Industrial Classification (SIC) codes—2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, and 5712—and made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particle board. Wood furniture component means any part that is used in the manufacture of wood furniture.

Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops.

A facility is a major source if it emits, or has the potential to emit, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAPs (when considering control equipment). HAP emissions from all operations must be considered when determining if your plant site is a major source. Operations not associated with wood furniture manufacturing or finishing must be included.

Owners and operators can misunderstand the term “potential to emit.” This term refers to the highest possible emissions if a facility were to operate at the full capacity of its equipment. It doesn’t refer to the highest recorded emissions to date.

While you may have very small emissions under normal operations, you may have the **potential** to emit above the major source level. It is very important to know the difference between your actual emissions and your potential to emit in order to stay in compliance.

Exemptions

The following facilities are not subject to this MACT standard. You may be exempt under one of these provisions even if your facility is a major source. You do not need a permit to operate if you meet these exemptions.

1. A manufacturer that is a major source but primarily manufactures products other than wood furniture or wood furniture components, if that facility **uses no more than 100 gallons per month** of finishing material or adhesives in the manufacture of wood furniture or wood furniture components (an incidental wood furniture manufacturer). Purchase or usage records must be kept demonstrating that the source meets the material usage criteria.



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2. A manufacturer that **never uses more than 250 gallons per month** of coating, gluing, cleaning, and washoff materials, including usage for manufacturing operations other than wood furniture or wood furniture components. Materials used in routine janitorial and facility grounds maintenance, for personal use by employees and others, or for maintaining motor vehicles operated by the facility may be excluded.

Coating, gluing, cleaning and washoff materials associated with wood furniture or wood furniture components must account for at least 90% of the manufacturer's annual HAP emissions. Records to demonstrate that the 90% criterion is being met, along with records of the total monthly gallons of coating, gluing, cleaning, and washoff material used, must be maintained.

3. A manufacturer that **never uses more than 3000 gallons during any 12 consecutive month period** of coating, gluing, cleaning, and washoff materials. This includes usage for manufacturing operations other than wood furniture or wood furniture components. Those materials excluded under the second exemption may also be excluded here.

The 90% criterion described under the second exemption also applies here. Records to demonstrate that the 90% criterion is being met, along with records of the total gallons of coating, gluing, cleaning, and washoff material used per month and each previous month, must be maintained. Records must be kept over each 12-month period.

4. A manufacturer that has **actual emissions of no more than 5 tons of any one HAP, or no more than 12.5 tons of any combination of HAPs, during any 12 consecutive month period**. This includes emissions from source categories other than wood furniture. At least 90% of the manufacturer's HAP emissions during the 12-month period must be associated with the manufacture of wood furniture or wood furniture components. Follow the instructions above to track the 90% figure.
5. Research or laboratory facilities are also exempt.

I'm Exempt. Now What?

For any of the above exemptions, whether based on usage or emissions, you **must** maintain records showing that you meet the level at all times. Records should include monthly usage of all finishing, gluing, cleaning, and washoff materials, certified product data sheets for these materials, and any other records necessary to document emissions from processes other than wood furniture or components.

If you are using exemption #4, carefully monitor monthly emissions when they approach the levels shown. You must to **apply for and receive** a synthetic minor operation permit from DNR **before** exceeding an exemption level in order to stay in compliance. If you exceed one of the levels in exemption #4 and have not received a permit restricting emissions below the major source level, then you will be required to comply with the MACT standard.

If you need to apply for a permit, go to the DNR's Permit Primer at: <http://dnr.wi.gov/SmallBusiness/Primer/>. Click on the Air section, follow the prompts for an existing business, and bypass the exemptions because you know you need a permit. The Primer will walk you through sections of the permit application to help you determine which forms to submit. Contact the Small Business Environmental Assistance Program, as shown at the end of this fact sheet, for assistance.

Compliance Schedule

Existing wood furniture operations should already be in compliance with all applicable requirements of the Wood Furniture Surface Coating MACT rule. Some facilities were initially exempt from the rule, but if

growing production levels have resulted in increased emissions they may have exceeded the exemption levels without realizing and may need to re-evaluate their status.

New major sources must comply immediately upon startup. A new facility that is not a major source, but which later becomes a major source, must comply **immediately** upon becoming a major source.

Initial Notification

The deadline for existing sources to submit an initial notification has passed. New or reconstructed sources are required to submit an initial notification no later than 120 days after initial startup. If you miss any deadline, contact your local DNR Air Program compliance inspector to determine how you should come into compliance

Emission Limits

MACT includes limits on the volatile hazardous air pollutant (VHAP) content of finishing materials and contact adhesives, and on the VOC content of strippable spray booth coatings. See Table 3 in Appendix A for a summary of these limits and the methods required to comply. Because the list of VHAPs is quite long, refer to EPA's guide, *Wood Furniture Manufacturing Operations NESHAP Implementation Document*, EPA-456/R-97-005. It is available on the web at <http://www.epa.gov/ttn/atw/wood/riwood.html>.

Work Practice Standards

In addition to numerical emission limits, work practice standards are included to reduce waste and evaporation of HAPs. See Appendix A for these standards. The work practice standards include good housekeeping and material tracking, employee training, inspection and maintenance, and application equipment restrictions. These practices focus attention on quality control issues that will result in the minimization of HAP and volatile organic compound emissions. Table 4 contains a summary of the work practice standards.

Record Keeping and Reporting

All facilities will be required to maintain records and provide periodic reports to the air pollution control agency. The specific records that must be maintained depend on the compliance demonstration method being used. Reports must be submitted to support and certify both initial and continuous compliance. The specific information that must be included in these reports depends on the compliance demonstration method being used. Compliance certification reports to certify continuing compliance are due every 6 months, as indicated in your operation permit.

DISCLAIMER — This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.



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