

- 1. Two methods for being classified as an area source are using less than 250 gallons per month (3,000 gallons per rolling 12 month period) of finishing, gluing, cleaning and washoff materials or using materials that contain no more than 5 tons of any one HAP or more than 12.5 tons of any combination of HAPs per rolling 12-month period. Are these limits based on usage or emissions? Can the amount of HAPs in waste streams be subtracted in order to determine the usage?**

These limits are based on usage and not on emissions. Therefore, HAPs in waste streams cannot be subtracted when determining usage. Any material that is introduced into a process must be included in the usage calculation.

- 2. After a facility has been determined to be a major source can it be redesignated as an area source?**

No. If a facility is a major source and must comply with the Wood Manufacturing Operations NESHAP, it will always be subject to the requirements in the NESHAP. In order to avoid always having to comply with this standard, the facility would have to meet the criteria for an area source BEFORE its compliance date.

(The compliance dates are as follows:

<i>Existing source that emits less than 50 tons of HAPs in 1996</i>	<i>December 7, 1998</i>
<i>Existing source that emits 50 tons or more of HAPs in 1996</i>	<i>November 21, 1997</i>
<i>New source</i>	<i>December 7, 1995 or upon startup)</i>

- 3. Does the Wood Furniture Manufacturing Operations NESHAP only apply to the SIC codes that are listed in the rule?**

No. If a facility's primary SIC code is not one of those listed in the rule it may still be subject if it has operations that could be classified as one of the covered SIC codes. For example, if a chemical manufacturing facility makes its own wood furniture it could be subject to the NESHAP. If all of a facility's operations fit into SIC codes that are not covered by the NESHAP, it is not subject.

- 4. Does this rule apply to all HAPs or just to volatile HAPs (VHAPs)?**

All HAPs must be used when calculating a facility's potential to emit to determine whether it is a major source. However, the emission limits in this NESHAP apply to VHAPs and not to non-volatile HAPs.

- 5. What is a synthetic minor source and what does a facility have to do to become one?**

A synthetic minor source is a facility that is major based on its potential emissions but is not a major source based on its actual emissions. To become a synthetic minor source, a facility should apply for a permit to install from the Air Quality Division. This permit will provide a federally enforceable limit to restrict the facility's potential to emit. Remember that in order to avoid the requirements of the NESHAP, permit conditions for synthetic minor sources must be in place before the facility's compliance date.

6. If a facility is subject to the Wood Furniture Manufacturing Operations NESHAP will it also have to comply with the Flatwood Paneling NESHAP?

If the facility is still a major source on the compliance date for the Flatwood Paneling NESHAP, it must comply with that standard in addition to the Wood Furniture NESHAP that it is already complying with.

7. How are the requirements for this NESHAP incorporated into the renewable operating permit application?

If the facility knows that it will be subject to the NESHAP it should include the requirements in the renewable operating permit application on form AR-002 and list them as future requirements. If the application has already been submitted and the requirements for the NESHAP were not listed, the application should be modified to address these additional requirements.

8. If a facility has 14 booths plus 2 touch up booths, which booths must be used for the averaging calculation?

The averaging calculation is for the entire facility and is not broken down by emission points. Therefore, all 16 booths must be included for the averaging calculation.

9. If a facility is recycling cleaning solvent back into a coating, how does it determine the composition of the recycled cleaning solvent to know if it is in compliance with the % VHAP / % solids limit?

The recycled solvent should be analyzed using Method 311 to determine the VHAP content and using Method 24 to determine the solids content and the density.

10. If a facility is using all compliant coatings does it still have to develop a work practice implementation plan?

Yes, every facility subject to this NESHAP must meet all of the work practice standards.

11. When must the work practice implementation plan be submitted?

The work practice implementation plan must be developed within 60 days after the facility's compliance date. This plan is not required to be submitted.

12. Where in the NESHAP does it require suppliers to certify the VHAP contents of their materials?

The suppliers are not regulated by this standard, the manufacturers are. It is required for the manufacturer to have certified product data sheets (CPDS). Therefore, it is the responsibility of the manufacturer to get all necessary CPDS from its supplier.

13. Is transfer efficiency regulated under the NESHAP?

Transfer efficiency is not included in the rule. However, it is indirectly regulated by the ban of using conventional air spray guns except for a few exceptions.

14. A wood furniture manufacturer applies two stains, then a sealer, then two more stains. Do the last two stains have to be compliant materials?

In order to know which emission limit to use, it is important to understand the difference between different operations such as staining and topcoating. In this example the last stains may be considered topcoats. Therefore, they would have to meet the limits for compliant topcoats.

15. Are facilities not subject to the NESHAP required to do anything.

Facilities must keep records that demonstrate that they are not subject. These records must be maintained for five years.

16. What should a facility do that is subject to the NESHAP but did not submit the initial notification report by September 2, 1996.

Submit the initial notification report as soon as possible.