PERMIT REVIEW SUMMARY

Permit Writer: Ivelina Pilgrim Date: September 30, 2022

Company Name: La-Z-Boy, Inc. – Plant 21

Facility Location: 9482 Eastside Drive Extension

 Newton, MS

Source Number: 1980-00010

County: Newton

FACILITY DESCRIPTION

La Z Boy Inc., Plant 21 (“La-Z-Boy”) is an existing facility that manufactures components for upholstered furniture from plywood, oriented strand board (OSB), and particle board. The facility’s overall operations fall under SIC Codes 2499 (Wood Products, Not Elsewhere Classified) and 2519 (Household Furniture, Not Elsewhere Classified).

La-Z-Boy receives sheets of plywood, OSB, and particle board and cuts them into patterned shapes. Some of the components undergo drilling and routing prior to being packaged for shipment. Emissions from the facility’s woodworking operations are controlled by three baghouses (Emission Points AA-001, AA-002 and AA-003).

PROJECT/PERMIT ACTION DESCRIPTION

On April 28, 2022, the facility submitted an application for a renewal of its Synthetic Minor Operating Permit (SMOP). The facility is proposing the addition of one (1) natural gas-fired heater for thermal pest control on wood pallets. Additionally, based on the MDEQ’s review of the application, a Title V major source avoidance limitation for particulate matter less than 10 microns (µm) in diameter (PM10) has been included within the renewed SMOP due to the conservative nature in which the facility calculated PM-related emissions. As a result, the permittee will be required to calculate the monthly PM and PM10 emissions from the baghouses (Emission Points AA-001, AA-002 and AA-003).

EMISSION SUMMARY

Table 1: Facility-Wide Emissions

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **PM** | **PM10** | **PM2.5** | **SO2** | **NOX** | **CO** | **VOCs** | **Lead** | **Ind. HAP** | **Total HAPs** |
| Uncontrolled Potential Emissions (tpy) | 73.8 | 73.81 | - | - | 9.8 | 4.1 | 0.6 | - | - | - |
| Emission Limitations (tpy) |  | 99.02 |  |  |  |  |  |  |  |  |

1. The MDEQ assumed the facility’s uncontrolled potential-to-emit PM10 is equal to PM.
2. The facility’s current uncontrolled potential emissions are less than the applicable threshold of 100 tons per year (tpy) for PM10. However, these emissions may vary based on the facility’s material throughput, production and engineering assumptions. Therefore, the facility will operate the air emission control equipment while the process equipment is in operation and track PM and PM10 emissions to ensure that a synthetic minor status is maintained.

APPLICABLE/PROPOSED PERMIT LIMITATIONS

Although, the facility’s uncontrolled potential-to-emit PM10 is less than the applicable Title V major source threshold of 100 tpy, it may change based on the facility’s material throughput, production capabilities, and engineering assumptions. Therefore, in order to ensure its synthetic minor status, the facility will operate each baghouse (Emission Points AA-001, AA-002 and AA-003) at all times the corresponding process equipment is in operation.

NSPS APPLICABILITY

There are no applicable NSPS standards under 40 CFR Part 60.

MACT APPLICABILITY

There are no applicable MACT standards under 40 CFR Parts 61 and 63.

**PUBLIC PARTICIPATION**

The 30-day public notice period began on October 5, 2022, with the publication of a notice in the *Newton County Appeal* and ends November 4, 2022.

**RECOMMENDATION**

The staff has preliminarily decided to recommend issuance of the permit to the Mississippi Environmental Quality Permit Board as shown in the draft permit. However, the staff recommendation to the Board will be made only after a thorough consideration of all public comments.