

## **APPENDIX 112O**

**WOOD FURNITURE MANUFACTURING OPERATIONS  
(40 CFR 63 Subpart JJ)**

**CAA SECTION 112 NESHAP**



# Synopsis: Wood Furniture Manufacturing Operations NESHAP

CFR Location: 40 CFR 63 Subpart JJ

Regulatory Activity: Final Rule: 7 Dec 95 ([60 FR 62930](#)) / Corrections: 3 Jun 97 ([62 FR 30257](#)) / Amendments: 9 Jun 97 ([62 FR 31361](#)); 28 Dec 98 ([63 FR 71376](#))

Affected Sources: Major Sources of HAPs

Rule Summary: The final rule affects new and existing wood furniture manufacturing operations that are located at plant sites that are major HAP sources. This rule does not apply to refinishing operations, only original furniture manufacture. The final rule exempts "incidental wood furniture manufacturers" from all requirements except that they must keep records of coating purchases and usage. *An incidental wood furniture manufacturer* is a major source that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.

## NESHAP DEADLINE MATRIX

Source	Date C/R Commenced	Date of Startup	Notification Requirements	Notification Deadlines <sup>a</sup>	Compliance Deadline <sup>b</sup>	Compliance Status Report Deadline <sup>c</sup>	Ongoing Status Reports
Existing	≤06 Dec 94	≤07 Dec 95	Initial Notification	03 Oct 96 40 CFR 63 Subpart JJ Table 1	07 Dec 98 <sup>d</sup> 21 Nov 97 <sup>e</sup>	05 Feb 99 <sup>d</sup> 20 Jan 98 <sup>e</sup>	Semiannually: Due 30 days after 6-month reporting period beginning with compliance date.
		>07 Dec 95	Initial Notification	NLT 120 days after start up. 63.9 (b)(3)	63.800(e)	63.807(b)	
New	>06 Dec 94 ≤07 Dec 95	≤07 Dec 95	Initial Notification	05 Apr 96 63.9(b)(2)	07 Dec 95 63.800(f)	5 Feb 96 63.800(b)	Excess emissions report and continuous monitoring report as required. 63.807(c)
		>07 Dec 95	Application for approval of C/R & date C/R commenced. Anticipated start-up date. Actual start-up date.	ASAP before startup or 05 Feb 96 63.5(d)(1) 60-30 days before date 63.9(b)(4) 15 days after startup 63.9(b)(4)	Startup 63.800(f)	60 days after startup 63.800(b)	
	>07 Dec 95	>07 Dec 95	Application for approval of C/R. Intent to C/R. Date C/R Began. Anticipated startup date. Startup Date.	ASAP before C/R. 63.5(d)(1) ASAP before C/R. 63.9(b)(4) 30 days after date. 63.9(b)(4) 60-30 days before date. 63.9(b)(4) 15 days after startup. 63.9(b)(4)			

C/R = construction or reconstruction ASAP = as soon as practicable NLT = not later than

<sup>a</sup> Existing and new area sources that become major sources must submit an initial notification 120 days after becoming major. *63.9(b)(2)*

<sup>b</sup> Existing area sources that become major sources must comply within one year of becoming major. *63.800(e)* New area sources that become major sources must comply upon becoming major. *63.800(f)*

<sup>c</sup> Compliance Status Report: Only required if add-on emission controls are used to achieve compliance. *40 CFR 63 Subpart JJ, Table 1.*

<sup>d</sup> Deadline for facilities that emit <50 tons HAP per year.

<sup>e</sup> Deadline for facilities that emit ≥ 50 tons HAP per year.



## REGULATION STATUS

EPA issued the Wood Furniture Manufacturing Operations NESHAP on 7 Dec 1995 (60 FR 62930). Subsequent corrections and amendments are reflected in latest version of the Code of Federal Regulations, Volume 40, Part 63, Subpart JJ and are also highlighted in the Synopsis Table and the Subsequent Regulatory Activity sections of this appendix.

## RULE SUMMARY

### Applicability

The final rule affects new and existing wood furniture manufacturing operations that are located at plant sites that are *major HAP sources*. This rule does not apply to refinishing operations, only original furniture manufacturing. The final rule exempts “incidental wood furniture manufacturers” from all requirements except that they must keep records of coating purchases and usage.

### Key Definitions

Definitions essential to understanding the following discussion include:

*Wood furniture* means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.

*Wood furniture manufacturing operations* means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components. Examples of facilities that are likely to have wood furniture manufacturing operations are those described by any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 5712 and 2599.

*Incidental wood furniture manufacturer* means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.

*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.

### Standards

The rule contains emission and/or HAP content limits for coatings used for finishing, gluing, and cleaning operations associated with wood furniture manufacturing. The rule also contains work practice requirements.

This appendix does not contain a detailed overview of the NESHAP requirements since most military facilities that meet the applicability requirements will qualify as incidental wood furniture manufacturers.

For more detailed information on this rule refer to:

1. The latest version of 40 CFR 63 Subpart JJ contains several tables that summarize the requirements of the rule and show which sections of the NESHAP General Provisions (40 CFR 63 Subpart A) apply.
2. EPA's web page for this rule on the Unified Air Toxics Web Site at <http://www.epa.gov/ttn/uatw/wood/riwood.html>.

### **Compliance Deadlines**

Existing wood furniture manufacturing operations located at facilities that emit less than 50 tons of HAP must comply by 7 Dec 1998; operations at facilities that emit greater than 50 tons of HAP must comply by 21 Nov 1997. New sources must comply by 7 Dec 1995 or startup, whichever is later.

## **SUBSEQUENT REGULATORY ACTIVITY**

### **03 Jun 97 ([62 FR 30257](#)) Direct Final Amendments**

EPA is making several corrections to the NESHAP to eliminate typographical errors and clarify the intent of the regulatory test. None of these corrections are significant enough to detail in this appendix.

### **09 Jun 97 ([62 FR 31361](#)) Direct Final Amendments**

EPA changed the definition of "wood furniture component" in this direct final rule. The new definition prevents the NESHAP from applying to the process of gluing seat cushions (manufactured at another facility) to wood furniture. If a facility manufactures both wood furniture and foam cushions, the gluing process remains subject to the NESHAP.

### **28 Dec 98 ([63 FR 71376](#)) Final Amendments**

In these amendments, EPA made the following changes:

- Removed the subheadings and corresponding footnote "a" in Table 6 of Subpart JJ because they serve no substantive purpose. The original Table 6 contained subheadings for "nonthreshold" pollutants, "high-concern" pollutants, and "unrankable" pollutants.
- Revised the definition of "VHAP of potential concern" to reflect the change to Table 6.

- Revised section 63.803(l)(6) to eliminate the reference to the 112(g) regulations. This cross-reference is not necessary because Table 6 has been revised to include the de minimis value for each chemical.
- Revised Table 5 to change the de minimis level for 2-ethoxyethyl acetate from 5 to 10 tons per year.
- Revised Table 4 by removing trichloroethylene and perchloroethylene from the list of prohibited cleaning and washoff solvents.
- Removed Caprolactam from the list of VHAP in Table 2 because this chemical was delisted from the HAP list in section 112(b)(1) of the Clean Air Act.
- Clarified that the rule regulates only those organic solvents which are considered HAP by revising the definition of "organic solvent" and replacing the term "organic solvent" with the term "organic HAP solvent" throughout the rule.

### **MILITARY SOURCES**

Wood furniture manufacturing may occur in Public Works wood shops, Morale, Welfare, and Recreation activities such as hobby shops or self help, school wood shops, and on-base housing areas. Prison Industries located on military installations may manufacture wood furniture on a larger scale.

Fortunately this rule is limited to military installations that are major sources of HAPs. Most such installations will qualify for the incidental wood furniture manufacturer exemption. Exempt facilities must consolidate and keep records from all wood furniture manufacturing operations that occur on the installation to document that the facility does not exceed the usage limit for incidental wood furniture manufacturers.

### **CONTACTS**

EPA: [EPA Regional Offices](#)

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