

Georgia SBEAP Small Business Environmental Assistance Program



Wood Cabinet Manufacturing

SIC CODE: 2434 NAICS CODE: 337110

Wood furniture and related products are created from raw wood or wood products that require cutting, sanding, and other handling activities that generate wood dust. Wood dust is regulated as an air pollutant called "particulate matter" or PM. In addition, furniture and related products are often manufactured using paints and stains that generate volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) when applied.



Due to these potential emissions, an Air Quality permit may be required for your operations based on the pollutant emitted or the type of manufacturing for wood kitchen cabinets.

Only cabinet manufacturing (source category (Chapter 391-3-1-.03 (6) (h) (14) (iii). qualifies for permitting exemption. Wood product operations with SIC codes of 2426, 2431, 2434, 2441, 2448, 2449, 2499 may qualify for exemption.

Exemptions for Wood Kitchen Cabinet permitting do not apply to wood products operations that involve combustion equipment and coatings operations (pollutant category- Permit Exemptions- Chapter 391-3-1-.03 (6) (i) (iv).

Below are thresholds for facilities that are involved in coating operations for wood cabinets.

| | Cabinet Manufacturing Requirements- When a Permit is Required? Potential Emission Limits in Non -Attainment and Attainment Counties and threshold limits for permit exemptions | |
|------------------------------------|--|--|
| Facility Location | Potential Emission Limits/Permit Required | Potential Emission Limits/No Permit Required |
| Non-Attainment County ¹ | VOC : 5-25 tons per year HAPs: PTE >10 tpy >25 combined PM: PTE >100 tpy with control device- Synthetic | VOC : less than 5 tons per year HAPs: less than 10 tons per year or less than 25 tons per year combined |

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|--------------------------------|--|---|
| | Minor PTE < 100 tpy B Permit | PM: PTE < 100 tpy with control device- Synthetic Minor PTE > 100 tpy B Permit |
| Attainment County ² | VOC: 20-100 tons per year HAPs: PTE > 10 tpy > 25 combined PM: 20 tons of PM | VOC: emissions under 20 tons per year HAP: : PTE < 10 tpy < 25 combined PM: less than 20 tons of PM |

Definitions:

1. **Non-attainment County:** Non-attainment counties are the metro area counties of Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, and Rockdale.

2. **Attainment County:** Attainment counties are the counties outside the metro area other than Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, and Rockdale.

3. **VOC:** Volatile organic compounds (VOCs) are organic chemicals that have a high vapor pressure at ordinary room temperature. Their high vapor pressure results from a low boiling point, which causes large numbers of molecules to evaporate or sublime from the liquid or solid form of the compound and enter the surrounding air, a trait known as volatility. For example, formaldehyde has high VOC content.

4. **HAP:** Hazardous air pollutants, also known as toxic air pollutants or air toxics, are those pollutants that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects. EPA is required to control [187 hazardous air pollutants](#) .

5. **PM:** PM stands for particulate matter (also called particle pollution): the term for a mixture of solid particles and liquid droplets found in the air. Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye. Others are so small they can only be detected using an electron microscope.

Particle pollution includes:

- **PM₁₀:** inhalable particles, with diameters that are generally 10 micrometers and smaller; and
- **PM_{2.5}:** fine inhalable particles, with diameters that are generally 2.5 micrometers and smaller.

How small is 2.5 micrometers? Think about a single hair from your head. The average human hair is about 70 micrometers in diameter – making it 30 times larger than the largest fine particle.

Typical Permits:

Typical permits for small business cabinet manufacturers include the following:

- [Permit by Rule \(PBR\)](#) - Applicable for facilities involved in coating activities. A Permit-by-Rule establishes pre-determined operational limitations for certain industrial categories for the purposes of ensuring that a facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990. Chapter 391-3-1.03(11)(b)7. PBR permits are not required to pay operational fees at this time. Effective March 1, 2019, when applying for the Permit-by-Rule, an associated permit application fee of \$250 will be required.
- [Synthetic Minor Permit](#) - A Synthetic Minor permit imposes federally enforceable limits to restrict a facility's potential emissions to below major source thresholds- the maximum limit of a potential pollutant that a facility can emit . This option makes it possible for those facilities that can comply with the Synthetic Minor permit's federally enforceable limits to operate without the need for a Title V permit. Synthetic minor operational fees are currently \$1,700 per year. Effective March 1, 2019, when applying for the Synthetic Minor permit, an associated permit application fee of \$1,000 will be required.

Applying for a Permit:

The Georgia [SIP Construction & Operating Permit Application](#) (SIP Application) is used to apply for initial air quality permits and for modifications to existing air quality permits.

- The SIP Application consists of separate forms that request information about the facility, emission units, control devices, and pollutants emitted. Each application form contains specific instructions for completion. Chapter 319-3-1-.03(6)
- The SIP Application for a Generic Permit, a Permit-by-Rule and a Synthetic Minor Permit require addition forms.

Please contact SBEAP for all assistance with Permit by Rule application or SIP application. SBEAP can assist with potential emissions calculations as well as permit applications.

Regulatory Information and Factsheets

U.S. EPA Federal Regulations:

- [Rule and Implementation Information for Wood Furniture Manufacturing Operations](#)

Helpful Tools & Resources

- Indiana Department of Environmental Management (2009) - [Good Management Practices for Woodworking Manufacturing Facilities](#)
- Wisconsin SBEAP (2009) - [An Update on Wood Furniture MACT \(AM-480\) \[PDF\]](#)

Georgia & Regional Trade Associations

- [American Wood Council \(AWC\)](#)
 - [Cabinet Makers Association](#)
 - [Kitchen Cabinet Manufacturers Association](#)
 - [Wood Components Manufacturers Association](#)
 - [Georgia Association of Manufacturers](#)
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Other

For information about upcoming events related to cabinet manufacturing, please see SBEAP homepage scrolling calendar at www.gasmallbiz.org.
