

May 9, 1996

**FACT SHEET**

**FINAL CONTROL TECHNIQUES GUIDELINES DOCUMENT FOR  
WOOD FURNITURE MANUFACTURING OPERATIONS**

**TODAY'S ACTION...**

- The Environmental Protection Agency (EPA) is today issuing the final Control Techniques Guideline (CTG) document for control of volatile organic compound (VOC) emissions from wood furniture manufacturing operations. Wood furniture manufacturing facilities, including cabinet shops and residential and industrial furniture makers, emit VOCs during finishing and cleaning operations.
- EPA's final CTG is a result of successful partnerships among major stakeholders. The CTG document was developed through a regulatory negotiation in conjunction with the final air toxics regulation for wood furniture manufacturing operations (issued in November 1995). Participants in the negotiation included representatives from the furniture manufacturing industry (including small business), the coatings industry, environmental groups, and State and local air pollution agencies.
- The final document is intended to provide State and local air pollution authorities with an information base for proceeding with their own analyses of reasonably available control technology (RACT) for control of VOC emissions. The CTG reviews current knowledge and data concerning the technology and costs of various emission control techniques. A "presumptive norm" for RACT is included in the document; however, the presumptive norm is only a recommendation.

**WHAT ARE THE HEALTH AND ENVIRONMENTAL BENEFITS?**

- The application of the presumptive RACT by facilities in ozone nonattainment areas and the ozone transport region (comprised of 11 states and the District of Columbia to address interstate transport of ozone and other pollutants) will reduce VOC emissions from the wood furniture industry by about 20,335 tons per year, representing a 31% reduction from current levels. This estimate includes reductions associated with the work practice standards and the coating emission limits. The use of waterborne coatings and higher solids coatings will also reduce worker exposure to organic solvents.
- VOCs are the main component in forming ground-level ozone or

smog. Exposure to ground-level ozone cause respiratory problems, decrease lung function, and can damage agricultural crops.

## **BACKGROUND**

- The Clean Air Act Amendments of 1990 require that State Implementation Plans (SIPs) for certain ozone nonattainment areas be revised to require the implementation of RACT for control of VOC emissions from certain industrial sources. EPA defines RACT as "the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility." Under the Clean Air Act, EPA is required to issue eleven CTGs for industries such as aerospace manufacturing and shipbuilding and ship repair.
- This CTG includes a presumptive norm for RACT for control of VOC emissions from wood furniture manufacturing operations. Where applicable, EPA recommends that States adopt requirements consistent with the presumptive norm. However, States may choose to develop their own RACT requirements on a case-by-case basis or require more control than is recommended by the presumptive norm for RACT.

## **WHO WILL BE AFFECTED BY THE FINAL CTG?**

- The recommendation for RACT in the CTG is expected to apply to approximately 963 wood furniture manufacturing facilities in ozone nonattainment areas nationwide.

## **WHAT ARE THE MAIN COMPONENTS OF THE CTG?**

- The recommendation for RACT in the CTG is based on two requirements--emissions limits and work practice standards. Facilities may use low-VOC coatings, higher solids coatings, emissions averaging, or a control device to meet the emissions limits.
- The CTG recommends limiting the amount of VOC that can be contained in wood furniture coatings. Using low-VOC topcoats or using higher-solids sealers and topcoats is recommended to meet RACT; emission limits are specified for both options in kilograms of VOC per kilogram of coating solids (kg VOC/kg solids).
- The work practice standards recommended in the CTG will reduce waste and evaporation of VOC. Good housekeeping measures such as keeping containers of materials closed, periodic training of operators who use solvent and/or coatings, and performing periodic inspections to locate and repair leaking equipment

are recommended. In addition, a limit on the VOC content of strippable spray booth coatings is recommended. The recommended work practice standards also require accounting for the quantity of solvent used for cleaning and washoff, the number of pieces washed off, and the reason for the washoff. These work practices will focus attention on quality control issues that will result in the minimization of VOC emissions.

- The model rule in Appendix B of the CTG contains example monitoring, recordkeeping, and reporting requirements.

#### **HOW MUCH WILL THE CTG COST?**

- The annualized costs of implementing the recommended RACT requirements in the CTG to all affected sources in the wood furniture industry is about \$20 million.

#### **FOR FURTHER INFORMATION...**

- Anyone with a computer and a modem can download the CTG from the Clean Air Act Amendments bulletin board of EPA's electronic Technology Transfer Network by calling (919) 541-5742 (look under "Recently Signed Rules"). For further information about how to access the board, call (919) 541-5384. For further information about the CTG, contact Paul Almodóvar of EPA's Office of Air Quality Planning and Standards at (919) 541-0283.