AHFA Guidance Document for:
EPA Section 114 Questionnaire for
Boilers, Process Heaters, Incinerators, and Other Combustion Units

1.0 Guidance Document Overview

This document provides support to individual furniture manufacturing facilities in completing the *EPA Section 114 Questionnaire for Boilers, Process Heaters, Incinerators, and Other Combustion Units*, ICR No. 2286-01. The U.S.EPA is making this information request under Section 114 of the Clean Air Act in order to gather additional information about combustion units. The EPA sent letters to individual facilities in late August 2008 requesting information regarding their combustion units[1]. The additional information will be used to develop rewritten Maximum Achievable Control Technology (MACT) standards for the control of Hazardous Air Pollutants (HAPs). The AHFA anticipates that an accurate industry response will beneficially affect our membership facilities operating wood-fired boilers. The EPA questionnaire (referred to herein simply as "the Questionnaire") must be completed and returned to the EPA no later than October 6, 2008 (because October 4 falls on a Saturday), or a different date if specified in your cover letter. *Note that it is not necessary to submit Confidential Business Information or Attorney-Client Privileged Information.*

As it applies to our member facilities, the most important aspects of the Questionnaire are:

1) How we classify our wood-fired boilers (as boilers or incinerators)
2) How we convey to EPA that our wood fuel is *not* a waste, but is rather a valuable commodity used to provide heat
3) The potential cost for our membership to comply with the existing Commercial and Industrial Solid Waste Incineration (CISWI) rule

Consequently, the AHFA Guidance Document focuses on responses that will have a direct bearing on these issues.

[1] If you are a HAP major air emission source and you did not receive a copy of the Section 114 request letter from Jim Eddinger at the EPA, please contact Dean Kaiser of Stratus Environmental at (540) 961-0998 x11 for additional instructions.

The Questionnaire itself is provided in the following PDF document:

http://survey.erg.com/ss/data/CEM/SurveyOverviewDocument.pdf

The document includes links for respondents that guide them to several Excel-based online answer keys which should be used to respond to the PDF questionnaire form. The survey is divided into the following four parts:

- Part I – Facility Level Data
- Part II – Data from Each… Combustion Unit
- Part III – Fuel/Materials Analysis Data
- Part IV – Data from Each Incinerator Unit

This AHFA guidance document follows the EPA format and provides specific, question-by-question support organized by each part of the Questionnaire. Keep this document at your side when completing the EPA Questionnaire, and consider the technical guidance prior to answering each question. Also please note that if a particular question is *not* included in this guidance document, then the *answer is considered facility-specific* and you should simply include the best available information for your particular facility or combustion unit.

2.0 Responses for Part I – Facility Level Data

Be sure to answer these questions for facility listed on the Section 114 request letter you received in the mail (you may have more than one letter if you have more than one permitted facility). Remember that if the question is not listed in this document, it is considered facility-specific and you must provide the best available information for your particular circumstances.

6. Is you facility a major source of HAP?

You are a major source of Hazardous Air Pollutants (HAPs) if you have a Title V air operating permit and you have the potential to emit any single HAP at a rate greater than ten tons per year, or the potential to emit any combination of HAPs at a rate greater than 25 tons per year. The potential to emit means the maximum air emissions from the entire facility at its maximum operational design, taking into account federally-enforceable permit limitations.

It is anticipated that most facilities receiving the Section 114 request will be HAP major sources, although the EPA has stated that minor sources receiving the forms should also submit the questionnaire for later use in area source MACT development.

9. Select the facility's primary NAICS.

The primary NAICS for most AHFA member facilities is 337 – Furniture and Related Product Manufacturing. If you are uncertain of this response, a complete listing of furniture NAICS codes is included as Appendix A of this guidance document.

3.0 Responses for Part II.A.1. – Data for Small Gas-Fired Boilers

This sheet must be completed for each similar group of small gas-fired boilers. This applies only to gas-fired boilers with a heat input capacity of less than 10 MMBTU/hr. The term similar group is not specifically defined, but we suggest grouping small boilers that burn the same fuel and that are subject to the same set of requirements; these units may already be grouped together in your air permit. Copy the worksheet for each different grouping. (Note that small HEATERS are included on a different worksheet).

1b and 1c. Maintenance and combustion practice.

Be sure that you are adhering to minimum maintenance and combustion practices specified in your air permit, or by regulations in your state.

1c. CO Limit for Boilers.

All CO limits should be specified in your air permit, however be sure that you are adhering to minimum maintenance and combustion practices specified in your air permit, or by regulations in your state (which may be expressed on a lbs/MMBTU basis, sometimes calculated by an equation included in the rule).

4.0 Responses for Part II.A.2. – Data for Small Gas-Fired Process Heaters

This sheet must be completed for each similar group of small gas-fired process heaters. This applies only to gas-fired process heaters with a heat input capacity of less than 10 MMBTU/hr. The term process heater is not specifically defined in the questionnaire, but the vacated boiler MACT defines a process heater as:

> *"an enclosed device using controlled flame, that is not a boiler, and the unit's primary purpose is to transfer heat indirectly to a process material (liquid, gas, or solid) or to heat a transfer material for use in a process unit, instead of generating steam. Process heaters are devices in which the combustion gases do not come directly in contact with process materials. Process heaters do not include units used for comfort heat or space heat, food preparation for on-site consumption, or autoclaves."*

You may have process heaters associated with some presses, panel flow ovens, kilns, or other devices with stand-alone heat supplies. The term similar group is not specifically defined, but we suggest grouping small heaters that burn the same fuel and that are subject to the same set of requirements; these units may already be grouped together in your air permit. Copy the worksheet for each different grouping. (Note that small BOILERS are included on a different worksheet).

1b and 1c. Maintenance and combustion practice.

All CO limits should be specified in your air permit, however be sure that you are adhering to minimum maintenance and combustion practices specified in your air permit, or by regulations in your state (which may be expressed on a lbs/MMBTU basis, sometimes calculated by an equation included in the rule).

1c. CO Limit for Heaters.

All CO limits should be specified in your air permit, however be sure that your heater is not subject to state-specific CO limits (which may be expressed on a lbs/MMBTU basis, sometimes calculated by an equation included in the rule).

5.0 Responses for Part II.A.3. – Test Results for Small Gas-Fired Boilers or Process Heaters

Because we do not expect that our facilities would normally be required to test small gas-fired boilers or process heaters, we anticipate that membership responses will indicate that existing units have not been tested. If you have tested a small gas-fired boiler or process heater, download the SmallGasEmissionTestSpreadsheet.xls using the link at:

http://survey.erg.com/ss/wsb.dll/s/7q8d/SmallGasEmissionsTestSpreadsheet.xls,

and complete the spreadsheet with data from all of your available source tests. Be sure to complete both pages, for Organic HAP and CO *and for* PAH. *Copy the pages for each test.*

5. Do you have any boilers, process heaters, incinerators, or other combustion units at your facility (excluding small gas fired boilers or process heaters)?

We expect most or all of our member facilities will have combustion units larger than 10 MMBTU/hr. If you do NOT have any larger units, then please respond with "No", save the survey, and email it to combustionsurvey@erg.com, with an optional copy to combustionsurvey@strat.us for use by the AHFA (thank you!).

6.0 Responses for Part II.B.1.2 – Unit Design and Operating Data

This section is used to present data on all boilers and process heaters that are larger than 10 MMBTU/hr.

1a. Combustion device ID

Use the combustion device identification number from your Title V or other air operating permit.

1g. Is the unit subject to NSPS?

The unit is subject to NSPS if the boiler has a heat input capacity greater than 10 MMBTU/hr *and*:

- The boiler was constructed after June 9, 1989, *or*
- There was a physical change (*e.g.* modification) or operational change (*e.g.* fuel switch) made to an existing boiler since 1989 that resulted in an increase in emission rates of sulfur dioxide or particulate matter, *or*
- The boiler has been reconstructed[2] since 1989.

[2] A boiler is "reconstructed" if the cost of its replacement components is more than 50% of the cost of an identical new boiler.

The "year of NSPS" cannot be prior to 1989, and is the year in which the triggering event above occurred.

1i. Primary use of combustion device.

For most of our facilities the primary use of the combustion devices will be:

- ✓ Steam generation
- ✓ Space heat
- ✓ Process Heat (for ovens and presses)

Check all that apply at your facility. Dry wood off-fall is NOT a waste, therefore a primary use for our boilers would NOT be waste incineration unless you are operating in a non-characteristic manner.

1j. Additional uses of combustion device.

In some cases you may be permitted to combust waste finishing materials in your boiler. Combustion of finishing materials in your boiler may present a regulatory challenge in the future, and we encourage you to investigate legal, alternative means of disposing of waste finishing materials. If you have not combusted finishing materials since the current permit term began and you do not plan to combust waste finishing materials in the future, you may answer "No" to this question. (We also encourage you to remove permit terms allowing finishing waste combustion).

1n. Other combustion units.

Please note that the specification "kiln" in this category is intended to specify direct-firing kilns, and not the steam-heated kilns that are prevalent among wood furniture manufacturing plants.

2c. Is the operation seasonal?

<u>Seasonal operation</u> indicates an operating pattern that varies heat input demand depending on time of year, but follows the same pattern annually. Many wood furniture manufacturers do have a seasonal demand on their boilers due to changes in ambient temperatures that result in varying demand for process heat and space heat.

7.0 Responses for Part II.B.3a – Add-on Air Pollution Control Device Data

Control devices will be listed in order starting with the first to contact the exhaust. You must fill in facility-specific information including installation or modification dates.

A4. DDDDD upgrade or modification.

This question asks if an upgrade or modification had already been made in response to the original, now-vacated Boiler MACT. We are unaware that any wood furniture manufacturing facility made such an upgrade. If however you must answer "Yes" to this question, change the pre-filled response and please consider notifying the AHFA of such an upgrade by emailing Dean Kaiser at dkaiser@strat.us.

A10. Continuous Parameter Monitoring Systems (CPMS)

Please note that a device does not need to be continuous recording to be a CPMS, therefore a pressure drop gauge constitutes CPMS.

8.0 Responses for Part II.B.3b.4 – Combustion Controls and Good Combustion Practices

Be sure that you are following at a minimum all combustion practice requirements from applicable NSPS, state, and operating permit terms.

9.0 Responses for Part II.C.1-5. – Fuels/Materials Burned in the Combustion Unit

You must enter each material burned in the specified unit in the following order:

1) *Startup fuel,*
2) *Individual and co-fired fuels combusted during normal operation,*
3) *Additional fuels/materials that are not routinely combusted (including intermittent-use fuels).*

2a. Fuel/Material

The pull-down selections do not contain an accurate description of the kiln-dried wood fuel used in part by most wood manufacturers. For use of kiln-dried wood containing minimum glue or resin (such as glue lines and engineered wood scrap), please select "other solid" from the pull-down list and enter the following explanation: "Dried wood <20% moisture including engineered wood scraps". **It is important to differentiate our use of dried wood from combustion of other wet wood materials.**

2b. Located Upstream?

This cell is used to indicate whether the fuel is fed directly[3] to a boiler (B), process heater (P), or other unit (O). We expect the majority of the responses to indicate (B) or (P).

10.0 Responses for Part II.C.6-10. – Fuels/Materials Burned in the Combustion Unit

7b. Alternative method(s) for handling fuel or material

As they apply to your operations, please be sure to indicate the "other" wood category specified in question 2a. If you believe losing the ability to burn this fuel would result in landfilling and/or offsite sale, please check the corresponding boxes. Also, if you believe an inability to burn dry wood off-fall would result in facility closure due to the high cost of alternative fuels, please be sure to check that box. We believe the following disposal alternatives could apply to some or all of our member facilities:

- ✓ Send to a landfill off-site
- ✓ Dispose through local trash collection
- ✓ Sell to a processor for making a product
- ✓ Sell to off-site facility for use as a fuel
- ✓ Stop purchasing material from 3rd party
- ✓ Shut down facility

8. Compensating for Loss in Heating Value

We believe most facilities would "burn a fossil fuel such as coal, oil, or gas in the same units". The response does not allow us to indicate that some of our existing units might require modification.

9. Cost for CISWI Compliance

Both the Boiler MACT and CISWI rules were vacated, leaving a great deal of uncertainty as to what the targets for compliance would be. In the unlikely event that our units were regulated under CISWI, we would propose a subcategory for that rule as well. The AHFA believes that there is simply too much uncertainty regarding the target compliance requirements for CISWI, and therefore we suggest you answer "unknown" to this question.

[3] Our units are direct-fed. "Indirect" feeding refers to fuel processing before being fed to the combustion unit, such as coal gasification.

11.0 Responses for Part II.D – Test Results

Not all types of tests will be available, as there has not been an emission testing requirement for some of these units and/or some of the HAPs. The EPA is requiring the most recent test data available for each unit; they are also requesting additional (older) test data for the same units if available. Please be sure your fuel description is consistent with the fuel description used in the main survey forms. You may decide to provide additional data to assist in determining test variability, which will in turn help to quantify variability for the MACT floor determination. Note that it is not necessary to submit Confidential Business Information or Attorney-Client Privileged Information.

12.0 Responses for Part III – Fuels Analyses

The EPA is requiring the most recent test data available for each unit; they are also requesting additional (older) fuels test data for the same fuels if available. Use average test results for the same fuel supply on the same date; do not include statistical P_{90} results based on calculations from the vacated Boiler MACT. Please be sure your fuel description is consistent with the fuel description used in the main survey forms. You may decide to provide additional data to assist in determining laboratory test variability, which will in turn help to quantify variability for the MACT floor determination. Note that it is not necessary to submit Confidential Business Information or Attorney-Client Privileged Information.

13.0 Responses for Part IV (all sections) – Facilities that have an incinerator

The AHFA is not aware of any member facility that has an incinerator on site. We do ***NOT*** *complete these sections because we do not have incinerators. If you believe you might have an incinerator, please contact Dean Kaiser at dkaiser@strat.us.*

14.0 Submitting the Survey

After completing the survey forms and ensuring their accuracy, follow the EPA directions for submittal. Save the survey and email it to combustionsurvey@erg.com, with an optional copy to combustionsurvey@strat.us for use by the AHFA (thank you!).

APPENDIX A – FURNITURE NAICS CODES

Bedroom furniture (except upholstered), wood household-type, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Bentwood (steam bent) products (except furniture) manufacturing	321999	All Other Miscellaneous Wood Product Manufacturing
Bowling center furniture manufacturing	337127	Institutional Furniture Manufacturing
Buffets (furniture), wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Cafeteria furniture manufacturing	337127	Institutional Furniture Manufacturing
Camp furniture, metal, manufacturing	337124	Metal Household Furniture Manufacturing
Camp furniture, reed and rattan, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Camp furniture, wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Card table sets (furniture), wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Casters, furniture, metal manufacturing	332510	Hardware Manufacturing
Chair seats for furniture manufacturing	337215	Showcase, Partition, Shelving, and Locker Manufacturing
Church furniture (except concrete, stone) manufacturing	337127	Institutional Furniture Manufacturing
Computer furniture, metal household-type, manufacturing	337124	Metal Household Furniture Manufacturing
Computer furniture, wood household-type, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Concrete furniture (e.g., benches, tables) manufacturing	327390	Other Concrete Product Manufacturing
Custom design interiors (i.e., coordinated furniture, architectural woodwork, fixtures), manufacturing	337212	Custom Architectural Woodwork and Millwork Manufacturing
Dining room furniture, metal household-type, manufacturing	337124	Metal Household Furniture Manufacturing
Dining room furniture, wood household-type, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Fiber furniture (except upholstered), household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Furniture (except upholstered), metal household-type, manufacturing	337124	Metal Household Furniture Manufacturing
Furniture (except wood), office-type, padded, upholstered, or plain, manufacturing	337214	Office Furniture (except Wood) Manufacturing
Furniture (except wood, metal, upholstered) indoor and outdoor household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Furniture dimension stock, hardwood, unfinished, manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
Furniture dimension stock, softwood, unfinished, manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
Furniture dimension stock, unfinished wood, manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
Furniture frames and parts, metal, manufacturing	337215	Showcase, Partition, Shelving, and Locker Manufacturing
Furniture frames, wood, manufacturing	337215	Showcase, Partition, Shelving, and Locker Manufacturing
Furniture hardware, metal, manufacturing	332510	Hardware Manufacturing
Furniture inlays manufacturing	321999	All Other Miscellaneous Wood Product Manufacturing

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Furniture parts, finished metal, manufacturing	337215	Showcase, Partition, Shelving, and Locker Manufacturing
Furniture parts, finished plastics, manufacturing	337215	Showcase, Partition, Shelving, and Locker Manufacturing
Furniture parts, finished wood, manufacturing	337215	Showcase, Partition, Shelving, and Locker Manufacturing
Furniture squares, unfinished hardwood, manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
Furniture tops, glass (e.g., beveled, cut, polished), made from purchased glass	327215	Glass Product Manufacturing Made of Purchased Glass
Furniture trimmings made from purchased fabrics	314999	All Other Miscellaneous Textile Product Mills
Furniture, cut stone (i.e., benches, tables, church), manufacturing	327991	Cut Stone and Stone Product Manufacturing
Furniture, factory-type (e.g., cabinets, stools, tool stands, work benches), manufacturing	337127	Institutional Furniture Manufacturing
Furniture, hospital, specialized (e.g., hospital beds, operating room furniture), manufacturing	339113	Surgical Appliance and Supplies Manufacturing
Furniture, household-type, upholstered on frames of any material, manufacturing	337121	Upholstered Household Furniture Manufacturing
Furniture, institutional, manufacturing	337127	Institutional Furniture Manufacturing
Furniture, laboratory-type (e.g., benches, cabinets, stools, tables), manufacturing	337127	Institutional Furniture Manufacturing
Furniture, office-type, padded, upholstered, or plain wood, manufacturing	337211	Wood Office Furniture Manufacturing
Furniture, outdoor metal household-type (e.g., beach, garden, lawn, porch), manufacturing	337124	Metal Household Furniture Manufacturing
Furniture, outdoor wood household-type (e.g., beach, garden, lawn, porch), manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Furniture, public building (e.g., church, library, school, theater), manufacturing	337127	Institutional Furniture Manufacturing
Furniture, restaurant-type, manufacturing	337127	Institutional Furniture Manufacturing
Furniture, unassembled or knock-down wood household-type, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Furniture, unfinished wood household-type, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Furniture, wood household-type, not upholstered (except TV and radio housings, and sewing machine cabinets), manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Garden furniture, precast concrete, manufacturing	327390	Other Concrete Product Manufacturing
Garden furniture, stone, manufacturing	327991	Cut Stone and Stone Product Manufacturing
Garden furniture, wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Hospital furniture merchant wholesalers	423450	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers
Hospital furniture, specialized (e.g., hospital beds, operating room furniture)	339113	Surgical Appliance and Supplies Manufacturing
Household-type furniture, upholstered, manufacturing	337121	Upholstered Household Furniture Manufacturing
Household-type furniture, wood, not upholstered (except TV and radio housings and sewing machine cabinets), manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Institutional furniture manufacturing	337127	Institutional Furniture Manufacturing

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Juvenile furniture (except upholstered), metal manufacturing	337124	Metal Household Furniture Manufacturing
Juvenile furniture (except upholstered), wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Juvenile furniture, rattan and reed, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Juvenile furniture, upholstered, manufacturing	337121	Upholstered Household Furniture Manufacturing
Kiln furniture, clay, manufacturing	327124	Clay Refractory Manufacturing
Kitchen furniture, household-type, metal, manufacturing	337124	Metal Household Furniture Manufacturing
Kitchen furniture, metal household-type, manufacturing	337124	Metal Household Furniture Manufacturing
Kitchen furniture, wood household-type, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Lawn furniture (except concrete, metal, stone, wood) manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Lawn furniture, metal, manufacturing	337124	Metal Household Furniture Manufacturing
Lawn furniture, wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Living room furniture (except upholstered), metal, manufacturing	337124	Metal Household Furniture Manufacturing
Living room furniture (except upholstered), wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Living room furniture, upholstered, manufacturing	337121	Upholstered Household Furniture Manufacturing
Malacca furniture (except upholstered), household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Metal framed furniture, household-type, upholstered, manufacturing	337121	Upholstered Household Furniture Manufacturing
Modular furniture systems (except wood frame), office-type, manufacturing	337214	Office Furniture (except Wood) Manufacturing
Modular furniture systems, wood frame office-type, manufacturing	337211	Wood Office Furniture Manufacturing
Nonupholstered, household-type, custom wood furniture, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Nursery furniture (except upholstered), wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Nursery furniture, metal, manufacturing	337124	Metal Household Furniture Manufacturing
Office furniture (except wood), padded, upholstered, or plain (except wood), manufacturing	337214	Office Furniture (except Wood) Manufacturing
Office furniture, padded, upholstered, or plain wood, manufacturing	337211	Wood Office Furniture Manufacturing
Plastics (including fiberglass) furniture (except upholstered), household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Porch furniture (except upholstered), wood, manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing
Rattan furniture, household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Rattan ware (except furniture) manufacturing	321999	All Other Miscellaneous Wood Product Manufacturing
Reed furniture (except upholstered), household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Reed ware (except furniture) manufacturing	321999	All Other Miscellaneous Wood Product Manufacturing
Religious furniture manufacturing	337127	Institutional Furniture Manufacturing
Restaurant furniture (e.g., carts, chairs, foodwagons, tables) manufacturing	337127	Institutional Furniture Manufacturing

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Restaurant furniture merchant wholesalers	423210	Furniture Merchant Wholesalers
Rounds or rungs, furniture, hardwood, manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
School furniture manufacturing	337127	Institutional Furniture Manufacturing
Ship furniture manufacturing	337127	Institutional Furniture Manufacturing
Turnings, furniture, unfinished wood, manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
Upholstered furniture, household-type, custom, manufacturing	337121	Upholstered Household Furniture Manufacturing
Upholstered furniture, household-type, on frames of any material, manufacturing	337121	Upholstered Household Furniture Manufacturing
Wicker furniture (except upholstered), household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Willow furniture (except upholstered), household-type, manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
Wood framed furniture, upholstered, household-type, manufacturing	337121	Upholstered Household Furniture Manufacturing
Wrought iron furniture (except upholstered), household-type, manufacturing	337124	Metal Household Furniture Manufacturing