Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Howard Ard
DATE: October 11, 2012
SUBJECT: Evaluation Summary for Higdon Furniture Company, Inc., 0390006-004-AO, Gadsden County

We recommend issuing a permit to Higdon Furniture Company, Inc. to operate their furniture manufacturing facility. This permit follows 0390006-003-AO, effective December 4, 2007.

Process Description.
This facility consists of a furniture manufacturing plant, comprised of various woodworking machines, and a furniture finishing area that consists of three paint booths and two natural gas-fired drying ovens. The facility has converted from a solid wood product to particleboard that is used to make bedroom furniture. The use of particleboard has resulted in a reduction of wood waste, wood drying, boiler use, and furniture finishing (wood staining and solvent use). Many of the products now use a foil or a paper transfer finish that is glued onto the surface of the wood.

Pollution Control Equipment.
Particulate matter emissions produced by the furniture mill are controlled by two baghouses that collect the wood waste and dust from the mill area. Dust produced by the mill is pulled through duct pipes by fans and blown into the baghouses. The air goes through the filter bags and the dust falls to the bottom of the baghouse where it is sent to a dust trailer for transport off site for disposal.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions Tons/year	Allowable Emissions Tons/year
PM	62-296.320(4)c	23.0	<100
VOC	N/A	1.0	<100
HAP (Combined)	N/A	*0.47	<25
HAP (individual)	N/A	*0.38	<10
Objectionable Odors	62-296.320(2)	N/A	None allowed off plant property
VE	62-296.320(4)b	N/A	Not more than 20% opacity

The PM emissions estimate is based on baghouse design specifications. *VOC and HAP emissions are based on the amount of coating materials and cleaning solvents used from 2007 through 2011. The emissions estimate reported under HAP (individual) is for Toluene, the largest contributor of HAP. *Although solvent use has decreased over the past five years and current VOC and HAP emissions are considered to be below the generic emissions unit exemption limit specified by Rule 62-210.300(3)(b)1.c., F.A.C., the potential to emit is greater when business picks up in the future.

Applicable Rules & Regulations. This source is regulated in accordance with Rules 62-296.320(4)(b) & (c)., F.A.C.

Compliance Monitoring.
Recordkeeping and monitoring.

Compliance History.
File review shows one enforcement action was taken during the last five years. Enforcement action was taken in 2008 due to failure to perform required testing within 60 days of issuance of the permit. Management was unaware that a new test requirement had been written into the new permit. They immediately corrected the deficiency by scheduling and conducting the required test and forwarding the test results to DEP. A warning letter was issued September 16, 2008 (WL NWAP 039-1791). Considering the quick response on the part of management to correct the deficiency, the Department exercised enforcement discretion and closed case without pursuing any additional enforcement action.

Fee Summary. This is an AO2C for two emissions units ($750 x 2 = $1,500 fee) minor source with no required testing.

HA/c