Higdon Furniture Company, Inc.
Facility ID No.: 0390006
Gadsden County

Air Operation Permit
Permit No.: 0390006-004-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850.595.8300
Fax: 850.595.8096

[Electronic file name: 0390006-004-AO.doc]

Air Operation Permit
Permit No.: 0390006-004-AO

Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information	2
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions	
A. 002-Wood Furniture Finishing	5
B. 003-Dust Collection System	6
Appendices:	
Appendix G-1, General Conditions	

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Northwest District
160 W. Government St., Suite 308
Pensacola, Florida 32502-5740

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Permittee:
Higdon Furniture Company, Inc.

Permit No.: 0390006-004-AO
Facility ID No.: 0390006
SIC No(s).: 25, 2511
Project: Air Operation Permit

This permit is for the operation of the Higdon Furniture Company, Inc., facility located at 130 North Virginia Street in Quincy, Gadsden County; UTM Coordinates: Zone 16, 729.7 km East and 3386.5 km North; Latitude: 30° 35' 20" North and Longitude: 84° 36' 25" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: October 11, 2012
Renewal Application Due Date: August 12, 2017
Expiration Date: October 11, 2017

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/ha/c

Section I. Facility Information.

This is a renewal of permit 0390006-003-AO, effective December 4, 2007.

Subsection A. Facility 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. A wall mounted fan provides ventilation for the finishing area. 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.

The furniture manufacturing plant employs a wood waste collection and filtration system with two baghouses to 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 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.

The furniture finishing area does not utilize any specific control equipment. Emissions points for solvents include the paint booths, drying ovens and the wall mounted fan.

Based on the permit application received October 3, 2012, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

Facility ID No. 0390006	
EU ID No.	**Emissions Unit Brief Description**
002	Wood Furniture Finishing
003	Dust Collection System

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The document listed below is not a part of this permit; however, it is specifically related to this permitting action.

<u>This document is on file with permitting authority:</u>
Permit Application received October 3, 2012

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix G-1, General Conditions, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7)(b), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. All containers that are used for temporary and permanent storage of VOCs or organic solvents shall be covered where feasible to prevent vaporization of VOCs when not in use. All equipment, pipes, hoses, lids, fittings, etc., shall be operated in such a manner so as to minimize leaks and/or fugitive emissions and spills of volatile materials. [Rules 62-296.320(1) and 62-4.070(3), F.A.C., Application No. 0390006-004-AO]

7. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Paving and maintenance of roads, parking areas and yards.
b) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.

c) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d) Landscaping or planting of vegetation.
e) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
f) Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C.]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit four permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rule 62-4.090, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.59.-8300; Fax: 850.595.8096

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Tallahassee at Carr Building Suite 115, 3800 Commonwealth Blvd, Tallahassee FL 32301.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

EU ID No.	Emissions Unit Brief Description
002	Wood Furniture Finishing

This emissions unit consists of three paint booths, two natural gas-fired drying ovens and a wall mounted ventilation fan. No specific control equipment is utilized. Emissions points for VOC and HAP include the paint booths, drying ovens and wall mounted fan.

The applicant stated that the amount of coating materials and cleaning solvents consumed is controlled by the furniture production rate. Therefore, the quantity of finishing products consumed at the facility will be used to calculate the VOC and HAP emissions released from this emissions unit.

The furniture finishing operation is not subject to any source specific limitations.

Current VOC and HAP emissions are below permitting levels but permittee is keeping this emissions unit active for expected emissions increases when business improves in the future.

The following specific conditions apply to the emissions unit listed above:

Recordkeeping and Reporting Requirements

A.1. The owner or operator shall maintain records of the amount of coating materials and cleaning solvents that are used each year along with sufficient information to establish the emission levels of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). Records shall be available for inspection by the Department. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and Application No. 0390006-004-AO]

A.2. The owner or operator shall notify the Department of any changes in the facility's operation or materials used that would result in the reclassification of the facility into a major source of air pollution (100 tons/yr of VOC, or 10 tons/yr of any single HAP or 25 tons/yr of any combination of HAP). [Rules 62-4.160(2), and 62-210.200(PTE) F.A.C., and Application No. 0390006-004-AO]

Subsection B. This section addresses the following emissions unit.

EU ID No.	Emissions Unit Brief Description
003	Dust Collection System

This emissions unit consists of a wood waste collection and filtration system with two baghouses to collect the wood waste and dust from the mill area. Dust produced by the woodworking machines inside the manufacturing plant is pulled through duct pipes by fans and blown into 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. Baghouse #1, Model 484RF, and Baghouse #2, Model 124RJ, are manufactured by Donaldson Company, Inc. The polyester filters used on these dust collectors have an efficiency rating of 99.9%.

This emissions unit has no unit-specific emission limits, and is subject only to the Facility-wide Particulate Emission Limiting Standards - General Visible Emissions Standard.

The following specific conditions apply to the emissions unit listed above:

Monitoring of Operations

B.1. The operation of the baghouses shall be properly adjusted to maintain a 1 to 3 iWC pressure drop across the bags at all times to control particulate emissions. The pressure drop shall be checked once per operating day. [Rules 62-4.160(2) and 62-4.070(3), F.A.C., and permittee request - Application No. 0390006-004-AO]

Recordkeeping and Reporting Requirements

No recordkeeping is required for this emissions unit.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.