

FILE COPY

Higdon Industries, Inc.
Quincy Manufacturing Facility
Facility ID No.: 0390020
Gadsden County

Air Operation Permit
Permit No.: 0390020-005-AF

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

[electronic file name: 0390020-005-af.doc]

Air Operation Permit
Permit No.: 0390020-005-AF

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. Emissions Unit 001, a Wood fired Boiler with a McBurney Stoker and Controls and a multi-cyclone dust collector	6
B. Emissions Unit 003, Finishing Area consisting of paint booths and drying ovens	9
Appendices:	
Appendix G-1, General Conditions	



Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Higdon Industries, Inc.

Permit No.: 0390020-005-AF
Facility ID No.: 0390020
SIC Nos.: 25
Project: Air Operation Permit

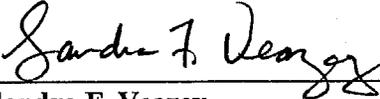
This permit is for the operation of Higdon Industry, Inc.'s Quincy Manufacturing Facility located at 1703 Florida Avenue, Quincy, Gadsden County; UTM Coordinates: Zone 16, 730.6 km East and 3385.8 km North; Latitude: 30° 34' 58" North and Longitude: 84° 35' 52" West.

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.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions

Effective Date: December 12, 2000
Renewal Application Due Date: October 2, 2005
Expiration Date: November 30, 2005

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**


Sandra F. Veazey
Air Program Administrator

SFV/rvk

"More Protection, Less Process"

Printed on recycled paper.

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of furniture manufacturing and finishing lines. Waste wood products are sized in a wood hog exempt from permitting pursuant to Rule 62-210.300(3)(a)11, F.A.C. Emissions from the wood hog are controlled by a Pneumafil bag filter (model 11.5-316-08). The waste wood is used as fuel in a 12 MMBtu/hr heat input wood fired boiler with a McBurney Stoker and Controls and emissions controlled by a Zurn Industries multi-cyclone dust collector (model MTSA-9-CYT). The facility has an auxiliary natural gas fired boiler for backup with an approximate heat input of 12 MMBtu/hr. This boiler is exempt from permitting pursuant to Rule 62-210.300(3)(a)2, F.A.C. Assembled furniture is finished in a line consisting of seven spray paint booths and four ovens and dryers.

A previously permitted drying kiln (EU 004) has been taken out of service and is no longer active.

Based on the permit application received October 31, 2000, this facility is not a major source of hazardous air pollutants (HAPs).

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

E.U. ID

<u>No.</u>	<u>Brief Description</u>
001	Wood fired Boiler with a McBurney Stoker and Controls and a multi-cyclone dust collector
003	Finishing area consisting of paint booths and drying ovens

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 documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

Permit Application received October 31, 2000

Application fee and Additional Information Request dated November 8, 2000

Additional Information Response received November 27, 2000

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 which cause or contribute to an objectionable odor. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-296.320(2), 62-210.200(203), 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. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. As required by rule, inspection, or change in process the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
 - b. The owner or operator shall report to the Department of Community Affairs (DCA) within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the USEPA/Chemical Safety Hazard Investigation Board or the National Response Center under Section 112(r)(6).
 - c. The owner or operator shall submit the required annual registration fee to the DCA on or before June 21, 1999 and on April 1 annually thereafter, in accordance with Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.
5. An annual operating report for air pollutant emitting facility, DEP Form 62-210.900(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office.
[Rule 62-210.370, 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, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. These shall include as a minimum the following procedures to minimize pollutant emissions:

- a. VOC containers shall be tightly covered or closed when not in use.
- b. Piping, valves, fittings, for VOCs shall be maintained in good operating condition.
- c. Excessive air turbulence across exposed VOCs shall be prevented.
- d. VOC spills shall be immediately confined and cleaned up, and waste VOCs shall be placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

7. The permittee shall take reasonable precautions to prevent the emission of unconfined particulate matter. 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 water, or other dust suppressants to unpaved roads, yards, and similar areas as necessary.
- c. Removal of excessive particulate matter from roads and other paved areas to prevent excess particulate matter from manufacturing buildings or work areas from reentrainment or becoming airborne.
- d. Use of landscaping or planting vegetation.
- e. Use of hoods, fans, filters, and similar equipment.
- f. Confining abrasive blasting as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.]

8. 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 standard 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 which 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.

[Rule 62-297.310(7), F.A.C.]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

10. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.

[Rule 62-4.090, F.A.C.]

11. 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 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364, press 7; Fax: 850/595-8096

A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Tallahassee at 2815 Remington Green Circle, #A, Tallahassee FL 32308.

12. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, 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) 595-8364, then press 7, 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.

E.U. ID

<u>No.</u>	<u>Brief Description</u>
001	Wood fired Boiler with a McBurney Stoker and Controls and a multi-cyclone dust collector

This emission unit consists of a carbonaceous fuel fired boiler that uses waste wood generated by the facility to create steam for heating and coating drying. The boiler is wood fired with a McBurney stoker and controls with a maximum heat input of 12 MMBtu/hr. Fly ash is removed and particulate emissions controlled by a Zurn Industries multi-clone dust collector (model MTSA-9-CYT). The boiler has a vertical stack 50 feet high and 2 feet in diameter. The boiler was initially permitted May 9, 1984 with construction permit AC20-83270, and placed in operation December 17, 1984.

This wood waste fired boiler is subject to the requirements of Rule 62-296.410, F.A.C., Carbonaceous Fuel Burning Equipment, which imposes a tiered opacity limit on new burners less than 30 MMBtu/hr heat input. This boiler is not subject to the requirements of 40 CFR 60 Subpart Dc, since it precedes the applicability date of June 9, 1989.

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum heat input shall not exceed 12 MMBtu/hr, based on a maximum throughput rate of 0.72 tons/hour of wood-waste with a typical heat content of 16.6 MMBtu per ton.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction permit AC20-83270 issued May 9, 1984]

A.2. Methods of Operation - (i.e., Fuels). Fuel is limited to waste wood generated at this facility.

[Rules 62-4.160(2) and 62-213.440(1), F.A.C.]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions. Visible emissions are limited to a maximum of 20% opacity except that up to 40% opacity is permissible for not more than two minutes in any one hour.

[Rule 62-296.410(2)(a), F.A.C.]

Test Methods and Procedures

A.5. Visible emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for one hour. Such tests shall be scheduled between January 1 and February 28 of each year. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.6. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7) F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.7. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Monitoring of Operations and Recordkeeping Requirements

A.8. The permittee shall maintain records of the daily and monthly tonnage of wood waste burned in the boiler and hours of operation showing the average hourly heat input to the boiler. These records shall be maintained and made available for Department inspection. The permittee shall submit sample record keeping forms within thirty days of the effective date of this permit.

[Rule 62-4.070, F.A.C.]

Excess Emissions

A.9. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Higdon Industries, Inc.
Quincy Manufacturing Facility
Page 8

Permit No.: 0390020-005-AF

A.11. In cases of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection B. This section addresses the following emissions unit.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
---------------	--------------------------

003	Finishing area consisting of paint booths and drying ovens
-----	--

This permit allows operation of a finishing area consisting of a line of 7 spray paint booths, 4 ovens and dryers, and an exhaust ridge vent. The spray paint booths are equipped with baffles to reduce emissions. Emission points include stacks 1, 2, 3, 4, 5, 6, 8, & 9 for the spray booths (42" diameter stacks); emission point 10 consisting of nine, ten foot by 23" ridge vents, and emissions points 11, 12, 13, & 14 for the steam heated ovens and dryers. (24" diameter stacks).

The finishing area was initially permitted by construction permit 0390020-001-AC issued January 9, 1996. The construction permit included limits on surface coating materials usage, hours of operation, and VOC, Toluene, and HAP emissions.

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

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum allowable operating rate is 22,368 gallons of surface coating material (thinners, stains, lacquers, sheens) used per rolling twelve month period. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; construction permit 0390020-001-AC issued January 9, 1996, OP application dated October 24, 2000]

B.2. Hours of Operation. The Finishing Area may operate 2750 hours/year, based on 10 hours/day, 5.5 days/week, and 50 weeks per year. The permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., construction permit 0390020-001-AC issued January 9, 1996]

Emission Limitations and Standards

B.3 Emission limits. The maximum allowable emissions per rolling twelve-month period for the following pollutants are:

<u>Pollutant</u>	<u>Allowable Emissions</u>
VOCs	43.8 tons per year
Toluene	9.6 tons per year
HAPs	15 tons per year

[Rule 62-4.070 F.A.C.; construction permit 0390020-001-AC issued January 9, 1996, OP application dated October 24, 2000]

Recordkeeping and Reporting Requirements

B.4.a. VOC, HAP, and toluene emissions shall be tracked on logs commencing from the date of issuance of this permit with monthly materials usage and emissions calculations based on the VOC, HAP and toluene content (wt %) of the materials used. As a minimum, the logs shall include:

Identification of the raw materials (solvents, coatings, etc.) used,
Quantity, and manufacturer's coating formulation data of the materials used identifying
VOC content, HAP content, and toluene content for each material used.
VOC, HAPs, and individual HAP emissions (pounds and/or tons per month) based on
materials usage.

B.4.b. Monthly summaries shall be certified and signed by responsible company representative to be accurate and truthful calculated representations of actual emissions. Monthly summaries of materials usage and emissions shall be totaled for each consecutive twelve-month period, and shall be kept and maintained available for Department inspection for at least five years.

B.4.c. Permittee shall install, use, and maintain appropriate systems to gather data necessary to track emissions.

B.4.d. Permittee shall submit a summary of the record-keeping and reporting logs for Department approval within 30 days of receipt of this permit.

[Rule 62-4.070 F.A.C.; construction permit 0390020-001-AC issued January 9, 1996, OP application dated October 24, 2000]

Permit No.: 0390020-005-AF

Appendix G-1

GENERAL CONDITIONS:

Page 1 of 2

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. Nor 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 does not constitute 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring 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

Permit No.: 0390020-005-AF

Appendix G-1

GENERAL CONDITIONS:

Page 2 of 2

recurrence of the noncompliance. The permittee shall be responsible for any and all damages which 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 transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

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 measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- 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.