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

Air Operation Permit  
Permit No.: 0390020-006-AF

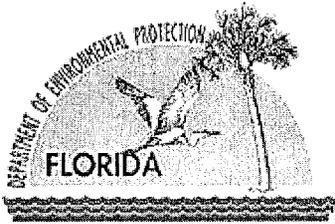
Permitting and Compliance Authority  
Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, FL 32502-5794  
Telephone: 850/595-8300  
Fax: 850/595-8096

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Air Operation Permit  
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# Department of Environmental Protection

Jeb Bush  
Governor

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502

Colleen Castille  
Secretary

Permittee:  
Higdon Industries, Inc.

Permit No.: 0390020-006-AF  
Facility ID No.: 0390020  
SIC Nos.: 2511  
Project: Air Operation Permit

This is a renewal federally enforceable operating permit (FESOP) for the operation of Higdon Industry, Inc.'s Quincy Manufacturing Facility located at 1703 Florida Avenue in 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: November 29, 2005**  
**Renewal Application Due Date: September 30, 2010**  
**Expiration Date: November 29, 2010**

**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

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**Sandra F. Veazey**  
**Air Program Administrator**

SFV:omc

**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 (EU 001) 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 (EU 003).

Based on the permit application received September 23, 2005, 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**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
001	Wood fired Boiler
003	Finishing Area

*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.

This document is on file with permitting authority:

Permit Application received September 23, 2005

## 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. 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. and permit 0390020-001-AC]
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. 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. and permit 0390020-001-AC]
5. 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. and permit 0390020-001-AC]
6. 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 work areas, roads and parking areas.
  - b. Good housekeeping consisting of cleaning/removal of particulate matter

accumulating in and around process machines such as sanders, saws, planers, wood chippers and associated exhaust hoods, blow pipes (exhaust ducts) and filtering devices (Pneumafil baghouse). Also, cleaning/removal of PM around waste wood storage bins, boiler feeding conveyers, the boiler itself, and those areas where waste wood is loaded onto truck trailers for removal from the facility.

- c. Maintenance of the integrity of the blowpipe system (exhaust ductwork) and associated equipment (exhaust hoods, and pneumafil baghouse) to prevent PM from spilling onto the ground and/or becoming airborne.

[Rule 62-296.320(4)(c)2., F.A.C., and application received 9/23/2005]

**7. 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.]

**8.** 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.]

**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 Governmental Center  
Pensacola, Florida 32502-5794  
Telephone: 850/595-8300, 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.

**10.** The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-8300, 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 850/595-8300, 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

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-cyclone 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 on 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 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. *{Permit note: The fuel throughput rate and heat content are not federally enforceable conditions. Fuel throughput is included to establish a surrogate parameter for determining operating capacity during compliance testing. Heat content is included to serve as a basis for calculating the average hourly heat input required by Specific Condition A.8.}*  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C. and permits AC20-83270 and 0390020-005-AF]

**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 (see Specific Condition **A.1**). The visible emissions tests shall be conducted in accordance with DEP Method 9 for one hour. Such tests shall be conducted each federal fiscal year (October 1 – September 30). 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 (see Specific Condition **A.1**). 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. Based on monthly totals, the average hourly heat input to the boiler shall be calculated and recorded. Records shall be maintained and made available for Department inspection upon request for at least two years.

[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.]

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**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

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, 10' 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 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. (See Specific Condition **B.4** for required recordkeeping.)

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0390020-001-AC]

**B.2. Hours of Operation.** The Finishing Area may operate 2,750 hours/year, based on 10 hours/day, 5.5 days/week, and 50 weeks per year. (See Specific Condition **B.4** for required recordkeeping.)

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., permit 0390020-001-AC]

##### 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

(See Specific Condition **B.4** for required recordkeeping.)

[Rule 62-4.070 F.A.C. and permits 0390020-001-AC and 0390020-005-AF]

**Recordkeeping and Reporting Requirements**

**B.4.** Rolling twelve month VOC, HAP, and toluene emissions shall be monitored by recordkeeping of relevant monthly materials usage and the VOC, HAP and toluene content (wt %) of the materials used. As a minimum, the recordkeeping shall include:

- Identification of the raw materials (solvents, coatings, etc.) used, Quantity, and relevant 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 and per rolling twelve-month period).

Records shall be maintained and made available for Department inspection upon request for at least two years.

Permittee shall install, use, and maintain appropriate systems to gather data necessary to calculate and record emissions.

[Rule 62-4.070, F.A.C. and permit 0390020-001-AC]

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GENERAL CONDITIONS:

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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 that 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

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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 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.