# Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary


## DRAFT PERMIT

**PERMITTEE**

Tropitone Furniture Co., Inc.
5 Marconi
Irvine, CA 92618

Authorized Representative:
Mr. Randy Danielson, CFO

Air Permit No. 0810219-004-AC
Permit Expires: 06/30/2013
Site Name : Main Building and Sunwest Facility
Minor Air Construction Permit
Sunwest Facility Relocation

This is the final air construction permit for relocation of the Sunwest Facility where tabletops are manufactured from reinforced plastic composites, without changes in operations or emissions. The proposed work will be conducted at the Sunwest Facility (Standard Industrial Classification No. 2514), located in Manatee County at 1125 Commerce Blvd. in Sarasota, Florida. The UTM coordinates are Zone 17, 346.52 km East, and 3032.68 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
*DRAFT*

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Randy Danielson, Tropitone Furniture Co., (radan@tropitone.com)
Chris Blume, Gaia Tech (cblume@gaiatech.com)
Henry Adamiak, P.E., Remediation Technologies, Ltd (hadamiak@remediationtech.com)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

_____ _____
(Clerk) (Date)

## FACILITY AND PROJECT DESCRIPTION

Tropitone Furniture Co., Inc. manufactures casual indoor and outdoor patio furniture, pool furniture, contract and hospitality furnishings, and patio umbrellas. They powder coat metal furniture and manufacture tabletops from reinforced plastic composites. The facility is composed of two locations, (1) Main Building and (2) Sunwest Facility. Activities at the Sunwest facility are regulated and all activities at the Main Building are currently exempt.

The existing facility consists of the following emissions units.

| Facility ID No. 0810219 | |
|---|---|
| ID No. | Emission Unit Description |
| 001 | Gelcoat and Resin Application |

### Project Description and Affected Emission Unit

The Sunwest facility will be relocated from its current location at 6530 18th Street East to 1125 Commerce Blvd., without any changes in the operation or emissions. No changes will be made to the Main Building. This project will modify the following emissions units.

| Facility ID No. 0810219 | |
|---|---|
| ID No. | Emission Unit Description |
| 001 | Gelcoat and Resin Application |

***NOTE:*** *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

### Exempt Emission Units/Activities

<u>All activities at Main Building:</u>

At the Main Building, patio furniture is formed and assembled. Aluminum tubing, plexi-glass and vinyl strapping are the primary raw materials. The chair and table-bottom manufacturing and assembly process begins with bending, cutting, and drilling the aluminum tubing using both hydraulic and pneumatic machinery. The tubing is then welded into frames and assembled, followed by an acid bath and rinse containing sulfuric acid, ammonium bifluoride, nitric acid, fluoride compound, and hydroxylamine sulfate. The frames are then powder coated with paint prior to being heated in a bake oven. Some frames receive plastic slides; cushions, straps, and fabric are attached to chair frames.

Exempt Activities include:

- Mold Fabrication: fabrication of silicone molds using polysiloxane and hardener.
- Welding: welding and associated fumes.
- Washer (1.0 MMBtu/hr): 3-stage furniture products washing process and associated emissions of reagents used in certain washes and natural gas combustion emissions.
- Dryer (1.5 MMBtu/hr): drying of furniture products and associated natural gas combustion emissions.

- Powder Coating Booth: powder coating of dried furniture products and associated particulate emissions.
- Curing Oven (3.0 MMBtu/hr): curing of powder-coated furniture products and associated natural gas combustion emissions.
- Batch Curing Oven (1.0 MMBtu/hr): curing of touch-up/small batch powder-coated furniture products and associated natural gas combustion emissions.
- Touch-Up Painting: application of aerosol touch-up paint to furniture products.
- Hand-Wipe Cleaning: cleaning of furniture products using denatured alcohol saturated rags.
- Spray Adhesive: adhesive used in sewing operations.

Sunwest Building:

- Mold Preparation: mold surface prep by cleaning with acetone and spray and/or hand application of mold wax. Mold will be used to create various table-top products.
- A/B Fill Casting: mixing and pouring of 2-part polyurethane resin into the mold.
- Patina Application: atomized-spray and/or hand application of latex paint to surface of some table-top products.
- Clear Application: spray application of clear sealant with atomized spray gun to surface of table-top product.

[Rules 62-210.300(3)(a)13 – *Brazing, Soldering, or Welding Equipment*, 62-210.300(3)(a)27 – *Surface Coating Operation*, 62-210.300(3)(a)33 - *Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour* and 62-210.300(3)(b), F.A.C.]

***NOTE:*** *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

**FACILITY REGULATORY CLASSIFICATION**

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic minor source of air pollutants: Total HAPs, Individual HAPs, and Volatile Organic Compounds (VOCs).

**PERMIT HISTORY/AFFECTED PERMITS**

Replaces Permit No. 0810218-002-AC.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number)

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements; and
   e. Appendix E. Unified Emission Factor for Open Molding Composites.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility"

(AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

   c. copies of the most recent month of records/logs specified in Specific Condition No A.6.

   The application shall be submitted to the Permitting Authority.

   [Rules 62-4.030, 62-4.050, and 62-4.220 F.A.C.]

## A. EU No. 001 Gelcoat and Resin Application

This section of the permit addresses the following emissions unit.

| ID No. | Emission Unit Description |
|---|---|
| 001 | Gelcoat and Resin Application.<br>At the Sunwest Facility, table-tops are manufactured by mixing a two-part polyurethane chemical in a silicone mold, which is initially lined with a gel coat then a resin. The principle operations at the site include: raw material receiving; mold cleaning using acetone; mold preparation using spray and hand-applied wax; gel coat application using an air-assisted atomized sprayer; resin application via an air-assisted atomized sprayer; "A/B fill" mixing and casting (poured into a mold); curing, cutting, sanding, and polishing of the cured tabletop; "patina" application using either an air-atomized sprayer or hand application using rags; air drying; hand application of sealer; bracket installation; and finally packaging the finished furniture product for transport to the Main Building or shipment directly to the customer. |

### PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation of are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

### EMISSIONS STANDARDS

A.2. Styrene Emission Limitation: Emissions of styrene, an individual HAP, shall not exceed 9.49 tons per any consecutive 12-month period.
*(Note: Styrene is the highest emitting individual HAP at this facility)*
[Rule 62-210.200(PTE), F.A.C.]

A.3. Total HAPs Emission Limitation: Total emissions of HAPs shall not exceed 10.80 tons per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.]

A.4. Total VOCs Emission Limitation: Total emissions of VOCs (including styrene) shall not exceed 10.80 tons per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.]

### NOTIFICATION REQUIREMENTS

A.5. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 001 (Gelcoat and Resin Application) at 1125 Commerce Boulevard, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

### RECORDS AND REPORTS

A.6. HAP and VOC Recordkeeping - The permittee shall keep monthly logs to document compliance with the styrene, Total VOC, and Total HAPs limitations in Specific Condition Nos. A.2., A.3., and A.4. Usage of materials may be based on inventory at the beginning of the

month, receipt of material during the month, and inventory of the materials at the end of the month, provided that the materials are not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Tropitone Furniture Co., Inc., 0810219, E.U. 001, Gelcoat and Resin Application);

b. month, year, and method used for records (usage or inventory);

c. identify and quantify each resin, coating, solvent, etc. used at the facility that contains Styrene, MMA, and/or other HAPs and VOCs;

d. appropriate emission factor(s), and method(s) of application (e.g., mechanical atomized, gelcoat controlled spray application) used to determine styrene, MMA and/or other HAPs and VOC emissions;

e. monthly total of styrene emissions (tons/month);

f. monthly total of VOC (including styrene) emissions (tons/month);

g. monthly total of Total HAP emissions (tons/month);

h. most recent 12 consecutive month period total of styrene emissions (tons/12 consecutive month period) based on (e.) above; and

i. most recent 12 consecutive month period total of VOC (including styrene) emissions (tons/12 consecutive month period) based on (f.) above.

j. most recent 12 consecutive month period total of Total HAP emissions (tons/12 consecutive month period) based on (g.) above.

*[Note: Emissions shall be determined and calculated based on material usage and species concentration. Additionally, styrene and MMA emissions shall be determined and calculated using the emission factors in the attached Appendix E (Composite Fabricators Association – Unified Emission Factors for Open Molding of Composites (July 23, 2001))].*

The monthly logs shall be completed by the end of the following month. These records shall be maintained at the facility for at least three (3) years and made available to the Department upon request. Supporting documentation such as styrene/VOC /HAP content, styrene/VOC/HAP emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each product which includes sufficient information to determine emissions.

Daily Recordkeeping

If any month results in styrene emissions greater than 90% of the allowable emission limit in Specific Condition No. A.2., for the prior consecutive 12-month period (i.e., 8.54 tons), the monthly log required shall be kept daily. The option of using purchases as a proxy for usage is not allowed for this daily recordkeeping. The total daily values for the month shall then be added to the previous 11-month period total emissions for styrene. The daily recordkeeping shall remain in effect until the consecutive 12-month period total styrene emissions are below 8.54 tons. These logs shall be completed within three (3) business days.
[Rule 62-4.070(3), F.A.C.]