Florida Department of Environmental Protection
Central District
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Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

ClosetMaid, Inc.
650 S.W. 27th Avenue
Ocala, Florida 34478

Authorized Representative:
Mr. Greg Swearingen, Environmental Manager

Air Permit No. 0830052-011-AF
Permit Expires: 07/12/2017
Site Name: ClosetMaid
Federally Enforceable State Operating Permit (FESOP)
Project Name: Permit Revision

This is the final Federally Enforceable State Operation Permit, which revises the current Air Operation Permit. ClosetMaid, Inc. (Standard Industrial Classification No. 3496) operates a closet shelving manufacturing facility. The facility is located in Marion County at 650 S.W. 27th Avenue in Ocala, Florida. The UTM coordinates are Zone 17, 386.32 km East, and 3228.62 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever

occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

July 12, 2012

Caroline D. Shine Date
District Air Program Administrator
Central District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including 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 July 12, 2012 to the persons listed below.

Mr. Greg Swearingen, ClosetMaid **(greg.swearingen@emerson.com)**
Mr. Brian A. Storey, P.E., Golder Associates Inc. **(bstorey@golder.com)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

July 12, 2012

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

ClosetMaid, Inc.

The facility is a closet shelving manufacturing facility.

The existing facility consists of the following emissions units.

Facility ID No. 0830052	
ID No.	Emission Unit Description
001	A-Coater Line
002	B-Coater Line
003	C-Coater Line
004	(4) Block Wire Draw Machines
005	Epoxy Paint Lines No. 1 and 2
006	(2) Burn-Off Ovens
007	Wastewater Evaporator
027	Polyvinyl chloride **(**PVC) Powder Mixing Line with (2) PVC Powder Storage Silos
028	D-Coater Line

Project Description

The purpose of this project is to revise Air Operation Permit No. 0830052-010-AO to include and incorporate terms and conditions for an additional emission unit EU 028, D-Coater Line. The D-Coater Line emission unit was constructed at the facility under Air Construction Permit No. 0830052-009-AC.

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 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 non-Title V source for total volatile organic compounds (VOCs), total HAPs, and individual HAPs.
- A 483-horsepower diesel-fired emergency generator manufactured by Katolite Corporation, Model #D300FRJ4T2 is subject to 40 CFR Part 60, Subpart A- General Provisions and 40 CFR Part 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

PERMIT HISTORY/AFFECTED PERMITS

Replaces permit No. 0830052-010-AO and incorporates terms and conditions of Construction Permit No. 0830052-009-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-897-4100

   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 Central District 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;
   e. Appendix E. 40 CFR Part 60, Subpart A; and
   e. Appendix F. 40 CFR Part 60, Subpart IIII

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. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an 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/)*; and

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

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. FACILITY-WIDE CONDITIONS

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	A-Coater Line has a 3-stage washer system that includes a first-stage heated by natural gas burners and second-and third-stage freshwater rinses, a dry-off oven, a primer dip tank, a pre-heat oven, a fluidized bed coating unit, and a post-heat oven, and a cool-down chamber. The particulate matter emissions are controlled by an electrostatic precipitator (ESP).
002	B-Coater Line has a 5-stage washer, a dry-off oven, a primer dip tank, a pre-heat oven, a fluidized bed coating unit, a post-heat oven, and a cool-down chamber. The particulate emissions are controlled by a Smog Hog ESP. There is a contact water heat exchanger before the ESP.
003	C-Coater Line has a 5-stage washer, a dry-off oven, a primer dip tank, a pre-heat oven, a fluidized bed coating unit, a post-heat oven, and a cool-down chamber. The particulate emissions are controlled by a Smog Hog ESP. There is a contact water heat exchanger before the ESP.
004	(4) Block Wire Draw Machines whose emissions are controlled by dust collectors.
005	Epoxy Paint Line No. 2 which includes a 4-stage washer, a dry-off oven, an automatic spray booth, and a cure oven. Particulate emissions are controlled by filters.
006	Burn-Off Oven which emissions are controlled by direct flame afterburners.
007	Wastewater Evaporator
027	PVC Powder Mixing Line with (2) PVC Powder Storage Silos located outside; each with a baghouse, a mixer, two coolers in series, a sifter (all located inside) with a Torit dust collector vented to the outside, and a new plasticizer tank also located outside.
028	D-Coater Line has a 3-stage washer system, a primer dip tank, a pre-heat oven, a fluidized bed coating unit, and a cure oven. The particulate emissions from the fluidized bed coating unit and the cure oven are controlled by a Smog Hog ESP.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum permitted combined utilization rate for PVC powder coating by the "A-", "B-", "C-"and "D-" Coater lines shall not exceed 8,819 tons per consecutive 12 months, updated monthly. The maximum permitted production rate of PVC powder coating by the powder mixing line is 8,819 tons per consecutive 12 months.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 0830052-009-AC]

A.2. Permitted Capacity: The maximum permitted utilization rate for powder coating by Epoxy Paint Line No. 2 shall not exceed 3,504 tons per consecutive 12 months, updated monthly.
[Rule 62-210.200(PTE), F.A.C.]

A.3. Permitted Capacity: The maximum permitted total heat input for the facility shall not exceed 656,600 MMBTU per consecutive 12 months, updated monthly.
[Rule 62-210.200(PTE), F.A.C.; Construction Permit No. 0830052-009-AC]

A. FACILITY-WIDE CONDITIONS

A.4. Authorized Fuel: Each combustion unit is permitted to fire natural gas only.
[Rule 62-210.200(PTE), F.A.C. and Construction Permit No. 0830052-009-AC]

A.5. Restricted Operation: The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.6. VOC or Organic Solvents (OS) Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOCs) or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions should include but not be limited to the following:

a. tightly cover or close all VOC containers when they are not in use,
b. tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
c. maintain all piping, valves, fittings, etc. in good operating condition,
d. prevent excessive air turbulence across exposed VOCs,
e. immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal

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

A.7. Unconfined Particulate Emissions: All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions shall include, but not be limited to, the following:

a. Paving and maintenance of roads, parking areas and yards;
b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities;
d. 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;
e. Landscaping or planting of vegetation;
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter;
g. Confining abrasive blasting where possible;
h. Enclosure or covering of conveyor systems; and
i. Maintenance of all filters in good working order.

[Rule 62-296.320(4)(c), F.A.C. and Permit Application received October 4, 2011]

A. FACILITY-WIDE CONDITIONS

A.8. Federal Regulatory Requirements: A 483-horsepower diesel-fired emergency generator manufactured by Katolite Corporation, Model #D300FRJ4T2 is subject to 40 CFR 60, Subpart A- General Provisions (See Appendix E) and Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (See Appendix F), which is adopted by reference in Rule 62-204.800, F.A.C. The conditions are incorporated into this permit (attached and part of this permit).
[Rule 62-204.800(8), F.A.C.]

The diesel-fired emergency generator is subject to the requirements of 40 CFR 60, Subpart IIII. Owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel. Except as otherwise specifically provided in CFR 80 Subpart I, all NR and LM diesel fuel is subject to the following per-gallon standards:

(1) Sulfur content
  (i) 15 ppm maximum for NR diesel fuel
(2) Cetane index or aromatic content, as follows:
  (i) A minimum cetane index of 40; or
  (ii) A maximum aromatic content of 35 volume present

Additionally, the installation of a non-resettable hour meter prior to startup of the engine is required. Maintenance checks and readiness testing of such units (engines) is limited to 100 hours per year.

EMISSIONS STANDARDS

A.9. VOC/HAP Emissions Limitation: The maximum facility-wide VOC/HAP Emissions are limited to the following:

Pollutant	Emissions
Total VOCs	less than 25.0 tons per any consecutive 12-months
Total HAPs	less than 25.0 tons per any consecutive 12-months
Individual HAPs	less than 10.0 tons per any consecutive 12-months

[Rule 62-210.200, (PTE), F.A.C.; Construction Permits No. 0830052-004-AC and 0830052-009-AC]

A.10. General Visible Emissions (VE) Limitation: 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). [Rule 62-296.320(4)(b)1., F.A.C.]

A. FACILITY-WIDE CONDITIONS

TESTING REQUIREMENTS

A.11. **Compliance Tests: During each federal fiscal year (October 1st to September 30th), the emission units shall be tested to demonstrate compliance with the emission standard for visible emissions. [Rule 62-297.310(7)(a)3., F.A.C.]**

A.12. Test Requirements: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9., F.A.C.]

A.13. Test Method: Required tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources: Shall be conducted for thirty minutes or the length of the batch/cycle if less than 30 minutes.

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other method may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

A.14. Monthly Recordkeeping Requirements: In order to demonstrate compliance with Specific Conditions No. **A.1., A.2., A.3., A.4.,** and **A.9.,** and pursuant to Rule 62-4.070(3), F.A.C., the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

a. Designation of the month and year of operation for which the records are being tabulated;

b. Consecutive 12-month total utilization rate for PVC powder coating by the "A-", "B-", "C-", and "D-" Coater lines;

c. Consecutive 12-month total production rate of PVC powder coating by the powder mixing line;

d. Consecutive 12-month total heat input at the facility;

e. Type of fuel fired in each combustion unit;

f. Consecutive 12-month total of total VOC, total HAPs, and individual HAPs emissions rates;

g. Recordkeeping for the emergency generator (hours of use and maintenance records).

[Rule 62-4.070(3), F.A.C.]

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data is available until such a time as a consecutive 12-month total can be maintained each month.

Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years and made available to the Department. The monthly logs shall be completed by the end of the following month.
[Rule 62-4.070(3), F.A.C.]

A.15. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.14.** above, must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in **the form of a template of sample calculations** and available for review on site by the Department.