TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

JELD-WEN, Inc.
1700 Avenue A
Kissimmee, Florida 34758

Facility ID No. 0970059

PROJECT

Project No. 0970059-005-AO
Application for Minor Source Air Operation Permit
Project Name: Operation Permit Renewal

COUNTY

Osceola County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
Orlando, Florida 32803-3767

May 29, 2013

Prepared by Stephen Amirault, Project Engineer

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Mr. Steve Akerman, General Manager
JELD-WEN, Inc.
1700 Avenue A
Kissimmee, Florida 34758
stevea@jeld-wen.com

B. Project Location:

1700 Avenue A
Kissimmee, Florida 34758

C. Project Summary:

This is an Permit renews Operation Permit 0970059-004 for the facility

D. Application Information:

Application and appropriate Application fee received on: 05/13/2013
Application Complete: 05/23/2013

Note: As requested, additional emission calculations were received from the applicant via electronic mail on 05/09/13. In addition, an amended Application listing a third paint spray booth in use at the facility, and visible emission test reports were received from the applicant via electronic mail on 05/23/13.

III. PSD Applicability for Project

As provided in the application, the total project emissions will not exceed the PSD significant emission rates; therefore, the project is not subject to the PSD preconstruction review.

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Stationary Source, General Requirements	Y	Not exempt from general permitting requirements
Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration	N	Facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Door manufacturing wood machining, cutting and sanding operations are a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Door manufacturing painting and gluing operations are a source category.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Osceola County is an attainment area for ozone.

Subject to:	Y/N	Comments
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-213, F.A.C. – Operation Permits for Major Source of Air Pollution	N	Facility is a synthetic minor source.

III. Summary of Emissions

As provided by the applicant, emissions from the additional material transfer line are expected to remain below the following values:

Pollutant	EU No. and brief description	Potential Emissions tons per year (tpy)[1]	Allowable Emissions (tpy)
PM	EU 001 - Wood Door Manufacturing Facility	12	12
VOC	EU 001 - Wood Door Manufacturing Facility	10	Less than 49[2]
Total HAP	EU 001 - Wood Door Manufacturing Facility	1.6	Less than 25[2]
Individual HAP	EU 001 - Wood Door Manufacturing Facility	1.58	Less than 10[2]
VE	EU 001 - Wood Door Manufacturing Facility		Less than twenty percent (20%) opacity

1. *Potential emission estimates from the facility are based on a maximum production rate of 3.5-million doors per year from the facility, and equivalent usage rates of: 42,000-gallons per year of paint, 350,000 gallons per year of PVA glue, and 4,000-gallons per year of hot mix glue, as provided in supplemental permit information dated 05/09/2013.*

2. *The VOC and HAP emission limitations were established in Construction Permit 0970059-001-AC dated 11/14/97. The limits were to allow the facility to potentially*

produce exterior type door products which require styrene for insulation as well as additional higher VOC and HAP containing materials for paints and insulation.

IV. Federal NSPS and/or NESHAP Provisions

There are no applicable federal NSPS or NESHAP provisions.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer, Stephen Amirault, at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767, 407/897-4100.