

**Mission:**

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



**Rick Scott**  
Governor

**John H. Armstrong, MD, FACS**  
State Surgeon General & Secretary

**Vision:** To be the Healthiest State in the Nation

October 21, 2013

**ELECTRONIC CORRESPONDENCE**

[Jeff@eurocraftcabinets.com](mailto:Jeff@eurocraftcabinets.com)

Jeff Canter, Vice President of Operations  
Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, Florida 33487

**Re:** Notice of Intent to Issue  
DRAFT Federally Enforceable State Operation Permit [FESOP] No. 0990704-001-AF

Dear Mr. Canter:

One copy of the DRAFT Federally Enforceable State Operation Permit (FESOP) for Distinctive Kitchens, located 7662 N.W. 6<sup>th</sup> Avenue, Boca Raton, Palm Beach County, Florida is enclosed. Also enclosed are the Health Department's Notice of Intent to Issue Permit (NOTICE OF INTENT), the Public Notice of Intent to Issue Permit (PUBLIC NOTICE), and the Technical Evaluation and Preliminary Determination.

The PUBLIC NOTICE must be published in the legal ad section of a local newspaper as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Laxmana Tallam, P.E., at the below letterhead address. If you have any other questions, please contact Mr. Tallam at 561-837-5900.

Sincerely,

For the Division Director  
Environmental Public Health

James E. Stormer, Q.E.P.  
Environmental Administrator  
Air & Waste Section

Enclosures:

**Florida Department of Health**

Palm Beach County, Division of Environmental Public Health  
P.O. Box 29, 800 Clematis Street, West Palm Beach, FL 33402  
PHONE: 561-837-5900 • FAX: 561-837-5294

**www.FloridasHealth.com**

TWITTER: HealthyFLA  
FACEBOOK: FLDepartmentofHealth  
YOUTUBE: fldoh

*In the Matter of an  
Application for Air Permit by:*

Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, Florida 33487

**Project No.** 0990704-001-AF  
Federally Enforceable State Operation Permit  
Palm Beach County, Florida

*Authorized Representative:*  
Jeff Canter, Vice President of Operations

**Facility:** Distinctive Kitchens

**NOTICE OF INTENT TO ISSUE A FEDERALLY ENFORCEABLE STATE OPERATION PERMIT (FESOP)**

On September 6, 2013, Distinctive Kitchens applied to the Florida Department of Health, Palm Beach County (Health Department) for a Federally Enforceable State Operation Permit (FESOP) in accordance with Rule 62-210.300(2)(b) of the Florida Administrative Code (F.A.C.). The applicant's authorized representative and mailing address is: Jeff Canter, V.P., of Operations for Distinctive Kitchens, 7662 N.W. 6<sup>th</sup> Avenue, Boca Raton, Florida.

On September 10, 2013 the Health Department received the correct application fee.

**Facility Location:** This facility is located at 7662 N.W. 6th Avenue, Boca Raton, Palm Beach County, Florida.

**Facility/ Project Description:** The application requested a federally enforceable, facility-wide operation permit which would limit potential emissions of regulated pollutants to below Title V applicability thresholds. Distinctive Kitchens is a custom cabinet and millwork manufacturer facility that supplies high-end residential and commercial bathroom cabinets, kitchen cabinets and interior door products. The facility is located in an industrial park consisting of commercial – light manufacturing buildings.

The operation is a source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). The applicant has requested the emissions of volatile organic compounds (VOC), individual HAP, and total HAPs to 95 tons per year (TPY), 9.5 tons per year, and 24.5 tons per year respectively. The predominant HAP from this facility is Toluene.

The facility conducts product coating operations in three spray paint booths -- pre-fabricated by Global Finishing Solutions. The painting operation will utilize both conventional pressure spray guns and a high velocity and low pressure (HVLV) paint delivery system with average transfer rate of 70%. The three spray paint booths are equipped with a bank of fabric filters with a rated removal efficiency of over 99 percent for particulates.

*The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 of the Florida Administrative Code (F.A.C.). However, in accordance with Section 403.182, F.S., FDEP recognizes the Florida Department of Health, Palm Beach County as the approved local air pollution control program in Palm Beach County. As such, FDEP and the Florida Department of Health, Palm Beach County have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits for this type of air pollution source located in Palm Beach County.*

**Permitting Authority:** Applications for federally enforceable state operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Health, Palm Beach County (Health Department) is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 800 Clematis Street, West Palm Beach, Florida. The Permitting Authority's mailing address is: Air & Waste Section (4<sup>th</sup> Floor), 800 Clematis Street, West Palm Beach, Florida 33401. The Permitting Authority's telephone number is 850-837-5900.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.).

Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue a federally enforceable state operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE" The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office at Air & Waste Section, Florida Department of Health, Palm Beach County (Health Department), 800 Clematis Street, Post Office Box 29, West Palm Beach, Florida 33402-0029 (Telephone: (561) 837-5900; Fax: (561) 837-5295), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the permitting authority's Legal Office, Attention: Chief Legal Officer, located at 800 Clematis Street in West Palm Beach, Florida, 33402 (Telephone: (561) 837-5900, Fax (561) 837-5295). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 the 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 Permitting Authority'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, F.A.C.

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

**Mediation:** Mediation is not available for this proceeding.

*Executed in West Palm Beach, Florida*  
FLORIDA DEPARTMENT OF HEALTH, PALM BEACH COUNTY  
For the Director of  
Division of Environmental Public Health



James E. Stormer, Q.E.P.  
Environmental Administrator  
Air and Waste Section

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (with received receipt) before the close of business on 10/21/2013 to the persons listed below.

Dale Francke, P.E.	email	<a href="mailto:dfrancke.pe@gmail.com">dfrancke.pe@gmail.com</a>
Joe Lurix, DEP/SED	email	<a href="mailto:Joe.Lurix@dep.state.fl.us">Joe.Lurix@dep.state.fl.us</a>
Ana Oquendo, EPA Region 4	email	<a href="mailto:oquendo.ana@epa.gov">oquendo.ana@epa.gov</a>
Barbara Friday, DEP/TAL	email	<a href="mailto:barbara.friday@dep.state.fl.us">barbara.friday@dep.state.fl.us</a>

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

Laymana Tallam  
(Clerk)

10/21/2013  
(Date)

**PUBLIC NOTICE OF INTENT TO ISSUE**  
**A FEDERALLY ENFORCEABLE STATE OPERATION PERMIT (FESOP)**

**FLORIDA DEPARTMENT OF HEALTH, PALM BEACH COUNTY**

DRAFT PERMIT NO. 0990704-001-AF  
Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, Florida, Palm Beach County

The Florida Department of Health, Palm Beach County (Permitting Authority) gives notice of its intent to issue a Federally Enforceable State Operation Permit (FESOP) to Distinctive Kitchens. The applicant's authorized representative and mailing address are: Jeff Canter, V.P., Distinct Kitchens., 7662 N.W. 6<sup>th</sup> Avenue, Boca Raton, Florida 33487.

**Facility Location:** This facility is located at 7662 N.W. 6<sup>th</sup> Avenue, Boca Raton, Florida 33487.

**Facility/ Project Description:** The application requested a federally enforceable, facility-wide operation permit which would limit potential emissions of regulated pollutants to below Title V applicability thresholds. Distinctive Kitchens is a custom cabinet and millwork manufacturer facility that supplies high-end residential and commercial bathroom cabinets, kitchen cabinets and interior door products. The facility is located in an industrial park consisting of commercial – light manufacturing buildings.

The operation is a source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). The applicant has requested the emissions of volatile organic compounds (VOC), individual HAP, and total HAPs to 95 tons per year (TPY), 9.5 tons per year, and 24.5 tons per year respectively. The predominant HAP from this facility is Toluene.

The facility conducts product coating operations in three spray paint booths -- pre-fabricated by Global Finishing Solutions. The painting operation will utilize both conventional pressure spray guns and a high velocity and low pressure (HVLP) paint delivery system with average transfer rate of 70%. The three spray paint booths are equipped with a bank of fabric filters with a rated removal efficiency of over 99 percent for particulates.

**Permitting Authority:** Applications for federally enforceable state operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Florida Department of Health, Palm Beach County (Health Department) is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 800 Clematis Street, West Palm Beach, Florida. The Permitting Authority's mailing address is: Air & Waste Section (4<sup>th</sup> Floor), 800 Clematis Street, West Palm Beach, Florida 33401. The Permitting Authority's telephone number is 850-837-5900.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue a federally enforceable state operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority

by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the permitting authority's Legal Office, Attention: Chief Legal Officer, located at 800 Clematis Street in West Palm Beach, Florida, 33402 (Telephone: (561) 837-5900, Fax (561) 837-5295). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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 the 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 Permitting Authority'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, F.A.C.

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

**Mediation:** Mediation is not available for this proceeding.

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To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



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**Vision:** To be the Healthiest State in the Nation

**October 21, 2013**

**ELECTRONIC CORRESPONDENCE**

[Jeff@eurocraftcabinets.com](mailto:Jeff@eurocraftcabinets.com)

**DRAFT FEDERALLY ENFORCEABLE STATE OPERATION PERMIT**

**ISSUED TO:**

Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, Florida 33487

*Authorized Representative:*

Jeff Canter, Vice President of Operations

<b>ARMS No.</b>	0990704
<b>Air Permit No.</b>	0990704-001-AF
<b>Issued:</b>	<b>DRAFT</b>
<b>Expires:</b>	<b>DRAFT</b>

**LOCATED AT:** Distinctive Kitchens, 7662 N.W. 6<sup>th</sup> Avenue, Boca Raton, Florida 33487

*UTM:* Zone 17; 590.482 km E; 2922.14 km N

*Address:* 7662 N.W. 6<sup>th</sup> Avenue, Boca Raton, Florida 33487

*Description:* Nonupholstered Wood Household Furniture Manufacturing [SIC: 2511; NAICS: 337122]

**STATEMENT OF BASIS:**

The Florida Department of Environmental Protection (DEP) has permitting jurisdiction for this project pursuant to Section 403.087 of the Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the DEP recognizes the Florida Department of Health, Palm Beach County (Health Department) as the approved local air pollution control program in Palm Beach County. As such, the DEP and the Health Department have entered into a Specific Operating Agreement that authorizes the Health Department to issue or deny permits for this type of air pollution source located in Palm Beach County. Accordingly, the Health Department issues this permit under the provisions of Chapter 403, F.S. and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The permittee is authorized to perform the work for the proposed project in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Health Department.

**ISSUED BY:**

*Executed in West Palm Beach, Florida*

Florida Department of Health, Palm Beach County

**DRAFT**

James E. Stormer, Q.E.P., Environmental Administrator  
Air & Waste Section  
Division of Environmental Public Health

SECTION I. FACILITY INFORMATION

PERMIT HISTORY

09-06-2013: Health Department received application for operation Permit (FESOP)

09-10-2013: Health Department received the correct application fee

Regulatory Classification

Title III: The facility is not a major source of hazardous air pollutants (HAPs).

Title IV: The facility will not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

RACT: The facility is not subject to any RACT requirements in accordance with Chapter 296, F.A.C.

PSD: The facility is not classified as a PSD source in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility is not subject to any requirements of 40 CFR 60.

NESHAP: The facility is subject to the requirements of 40 CFR 61, Subpart M, Asbestos.

RULE APPLICABILITY

The proposed project is subject to preconstruction review under the applicable provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). This facility is located in Palm Beach County, an area designated as "maintenance" for the pollutant ozone and attainment for all other criteria pollutants in accordance with Rule 62-204.340, F.A.C. The proposed project is not subject to review under Rule 62-212.400 F.A.C., Prevention of Significant Deterioration (PSD), because this new source is considered "minor" for the purpose of PSD regulations (having a potential to emit less than 250 tons per year of pollutant). The proposed facility is subject to the following air pollution control provisions:

F.A.C. Chapter 62-4.....	Permitting Requirements.
F.A.C. Chapter 62-204.....	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference.
F.A.C. Chapter 62-210.....	Required Permits, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms.
F.A.C. Chapter 62-212.....	General Preconstruction Review Requirements, PSD Requirements.
F.A.C. Rule 62-296.....	General Pollutant Emission Limiting Standards.
F.A.C. Rule 62-297.....	Test Methods.
F.A.C. Chapter 62-256.....	Open Burning and Frost Protection Fires.
F.A.C. Rule 62-257.....	Asbestos Program.

And the following National Emission Standards for Hazardous Air Pollutants:

- 40 CFR 61, Subpart M. - Asbestos.

PERMIT CONTENT

- Section I: Summary Information.
- Section II: Facility-Wide Specific Conditions.
- Section III: Emissions Unit Specific Conditions.
- Section IV: Appendices.
  - Appendix A: General Permit Conditions.
  - Appendix B: Citation Format.
  - Appendix: Exempt Activities

**SECTION I. FACILITY INFORMATION**

**SUMMARY OF EMISSION UNIT**

Distinctive Kitchens is a custom cabinet and millwork manufacturer facility that supplies high-end residential and commercial bathroom cabinets, kitchen cabinets and interior door products. The facility is located in an industrial park consisting of commercial – light manufacturing buildings.

The facility conducts product coating operations in three spray paint booths -- pre-fabricated by Global Finishing Solutions. The painting operation will utilize both conventional pressure spray guns and a high velocity and low pressure (HVLV) paint delivery system with average transfer rate of 70%. The three spray paint booths are equipped with a bank of fabric filters with a rated removal efficiency of over 99 percent for particulates.

The application requested a federally enforceable, facility-wide operation permit which would limit potential emissions of regulated pollutants to below Title V applicability thresholds. Distinctive Kitchens is a custom cabinet and millwork manufacturer facility that supplies high-end residential and commercial bathroom cabinets, kitchen cabinets and interior door products. The facility is located in an industrial park consisting of commercial – light manufacturing buildings.

The operation is a source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). The applicant has requested the emissions of volatile organic compounds (VOC), individual HAP, and total HAPs to 95 tons per year (TPY), 9.5 tons per year, and 24.5 tons per year respectively. The predominant HAP from this facility is Toluene.

**ID NOS. AND BRIEF DESCRIPTIONS**

EMISSION UNIT No.	EMISSIONS UNIT DESCRIPTION
001	<p><b>Bathroom and Kitchen Wood Furniture Surface Coating Operations</b></p> <p><i>Three Paint Booths – Global Finishing Solutions pre-fabricated spray booths used to paint and stain the finished product. Air pollutants are vented thru three Stacks with diameter of 30 " @10,000 CFH, 34" @10,500 CFM and 40" @20,000 CFM.</i></p>

**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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**1.0 ADMINISTRATIVE REQUIREMENTS**

- 1.1 Regulating Agencies: All applications, reports, tests, and notifications shall be submitted to the Air & Waste Section (4<sup>th</sup> floor) of the Florida Department of Health, Palm Beach County (Health Department) at P.O. Box 29 (800 Clematis Street), West Palm Beach, Florida, 33402-0029, and phone number (561) 837-5900. **[Specific Operating Agreement (SOA)]**
- 1.2 General Conditions: The permittee shall be aware of, and operate under, the attached General Conditions listed in **Appendix A** of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. **[Rule 62-4.160, F.A.C.]**
- 1.3 Citation Format: **Appendix B** of this permit provides the format for citing applicable regulations.
- 1.4 Application for Operation Permit: The permittee shall apply for a renewal of permit at least sixty (60) days **prior** to the expiration of this operation permit. The application shall include: the appropriate DEP form; the correct fee; all test reports required by this permit; and a summary of any changes or substitutions to equipment, processes, fuels, controls, etc., that vary from the original application. In accordance with the provisions of F.A.C. 62-210.350(1) and (4), an applicant shall publish a public notice of proposed agency action for any renewal application involving material changes from the existing permit and any application for permit revision. **[Rules 62-4.090 and 62-210.900, F.A.C.]**
- 1.5 Applicable Regulations: This facility is subject to the following regulations: Florida Administrative Code Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300, F.A.C. and the SOA]**

**2.0 EMISSION LIMITING STANDARDS**

- 2.1 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, the permittee shall not:
- (1) 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 No. 1 on the Ringelmann Chart (20 percent opacity). **[Rule 62-296.320(4)(b)1., F.A.C.]**
  - (2) If the presence of uncombined water is the only reason for failure to meet the visible emissions standards given in Rule 62-296.320(4)1, F.A.C., such failure shall not be a violation of the rule. **[Rule 62-296.320(4)(b)3, F.A.C.]**
  - (3) All visible emissions test performed pursuant to the requirements of Rule 62-296.320(b)(4)1, F.A.C. shall use EPA Reference Method 9, and shall meet all applicable requirements of Chapter 62-297, F.A.C. **[Rule 62-296.320(4)(b)1, F.A.C.]**
- 2.2 Notifications and Reports: The permittee shall submit all compliance-related notifications and reports required by this permit to the Health Department at:

**Florida Department of Health, Palm Beach County**

Air & Waste Section  
800 Clematis Street (4<sup>th</sup> Floor) / Post Office Box 29  
West Palm Beach, Florida 33402-0029  
Telephone: (561) 837-5900  
Fax: (561) 837-5925

- 2.3 Objectionable Odors: 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. **[Rule 62-296.320(2), F.A.C.]**

*Note: An objectionable odor is defined as 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. **[Rule 62-210.200, F.A.C.]***

- 2.4 General VOC Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions: The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds

**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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(VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. **[Rule 62-296.320(1), F.A.C.]**

2.5 **Unconfined Particulate Emission Limiting Standards:** Unconfined Emissions of Particulate Matter: The permittee shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include the following:

- (1) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- (2) Confining abrasives or dust from sand blasting, sanding, and/or grinding to the facility property line where possible. **[Rule 62-296.320(4)(c), F.A.C.]**

**3.0 PERFORMANCE STANDARDS**

3.1 **Circumvention:** The permittee shall not circumvent air pollution control equipment/methods or allow the emission of air pollutants without the equipment/methods operating properly. **[Rule 62-210.650, F.A.C.]**

3.2 **Excess Emissions Requirements:**

- (a) 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 are prohibited. **[Rule 62-210.700(4), F.A.C.]**
- (b) In case of excess emissions, the permittee shall notify the Air & Waste Section of the Health Department within one working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. **[Rule 62-210.700(6), F.A.C.]**
- (c) Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust the maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. **[Rule 62-210.700(5), F.A.C.]**

**4.0 COMPLIANCE MONITORING REQUIREMENTS**

4.1 **Duration:** Unless otherwise specified in this permit, all records and reports required by this permit shall be kept for at least 3 years from the date the information was recorded. **[Rule 62-4.160(14)(b), F.A.C.]**

4.2 **Test Procedures:** All test methods and procedures shall be performed in accordance with the applicable requirements of Chapter 62-297, F.A.C. **[Rule 62-297.100, F.A.C.]**

4.3 **Operational Rate during Testing:** Unless otherwise stated in the applicable emission limiting standard for a rule, testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. **[Rule 62-297.310(2), F.A.C.]**

4.4 **Test Notification:** At least 15 days prior to the date on which each formal compliance test is to begin, the permittee shall notify the Health Department in writing of: the test date; the expected test time; the location of the test; the facility contact person responsible for coordinating the test; and the person or company conducting test. The 15 day notification requirement may be waived at the discretion of the Health Department. Likewise, if circumstances prevent testing during the 60-day test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. **[Rule 62-297.310(7)(a)9., F.A.C.]**

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**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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4.5 Special Compliance Tests: When the Health 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 DEP rule or permit is being violated, it shall 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 Health Department. **[Rule 62-297.310(7)(b), F.A.C.]**

**5.0 REPORTS REQUIRED**

5.1 Annual Operating Report: The annual operating report shall be submitted to the Health Department by April 1 of the following year. If the report is submitted using the Department of Environmental Protection's electronic annual operating report software, there is no requirement to submit a hard copy to the Health Department. **[Rule 62-210.370(3), F.A.C.]**

5.2 Noncompliance Report: 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 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 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 Palm Beach County Health Department for penalties or for revocation of this permit. If an exceedance of a permit limit occurs, the permittee shall submit a written summary report of the incident to the Palm Beach County Health Department as specified in Facility-Wide Specific **Condition 3.2. [Rules 62-4.030, 62-4.130, and 62-210.700(6), F.A.C.]**

5.3 Emission Compliance Test Reports: For each required emissions compliance test, a report indicating the results of the test shall be filed with the Health Department as soon as practical, but no later than 45 days after the last sampling run is completed. The report shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Health Department to determine if the test was properly conducted and if the test results were properly computed. Additional report information may be specified for a given group of emissions units in this permit. **[Rule 62-297.310(8), F.A.C.]**

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

GROUP A. This portion of the permit addresses the following group of emissions units:

EMISSION UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	<p><b>Bathroom and Kitchen Wood Furniture Surface Coating Operations</b></p> <p><i>Three Paint Booths – Global Finishing Solutions pre-fabricated spray booths used to paint and stain the finished product. Three Stacks with diameters of 30" @10,000 CFH, 34" @10,500 CFM and 40" @20,000 CFM.</i></p>

1.0 OPERATING RESTRICTIONS

1.1 Hours of Operation: The permittee shall be allowed to operate the emissions unit for 8760 hours per year. **[Permittee’s request, and Rule 62-210.200(PTE), F.A.C.]**

1.2 Preventive Maintenance:

- All containers with VOC or HAP compounds shall be kept covered.
- Accidental spills shall be acted on promptly.
- Wiping rags shall be kept in explosion proof container.
- The owner or operator shall maintain the filters according the manufacturer’s specifications. These filters shall be inspected periodically to ensure the proper operation.

**[Rules 62-4.070(3) and 62-296.320(1), F.A.C]**

2.0 EMISSION LIMITING AND PERFORMANCE STANDARDS

2.1 VOC Limit: The facility-wide emissions of volatile organic compounds (VOC) shall not exceed 95 tons in any 12 consecutive months, rolling total. **[Rule 62-210.200, F.A.C., and applicant’s request to escape Title III/V of the Clean Air Act.]**

2.2 Individual HAP Limit: The facility-wide emissions of any single hazardous air pollutant (HAP) shall not exceed 9.5 tons in any 12 consecutive months, rolling total. **[Rule 62-210.200, F.A.C., and applicant’s request to escape Title III/ V of the Clean Air Act.]**

*{Permitting Note: The predominant HAP emitted from the facility is Toluene.}*

2.3 Combined HAP Limit: The facility-wide emissions of total hazardous air pollutants (HAP) shall not exceed 24.5 tons in any 12 consecutive months, rolling total. **[Rule 62-210.200, F.A.C., and applicant’s request to escape Title III/V of the Clean Air Act.]**

*{Permitting note: Compliance with the emission limits discussed above will ensure that the facility does not operate as a major source of hazardous air pollutants (HAPS). As a synthetic minor source, this facility will not be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart JJ- National Emissions Standards for Wood Furniture Manufacturing}.*

3.0 COMPLIANCE ASSURANCE MONITORING

3.1 Emissions Inventory: The permittee shall maintain a current emissions inventory for the source in order to ensure compliance with the emissions limits of **Specific Conditions 2.1, 2.2 and 2.3** of this Section. As a minimum, the emissions inventory shall be reviewed and updated monthly, as needed. The emissions inventory shall include the following:

Materials Inventory: To ensure compliance with the emission caps of permittee shall develop and maintain an inventory of raw materials (i.e., lacquers, thinners, sealers, coatings, cleaning solvents, etc.) used at the source.

As a minimum, the raw material inventory shall be reviewed and updated with the same frequency as the emission monitoring strategy being implemented (monthly or weekly). The inventory shall contain, as a minimum, the raw material name, the density (lb/gal), the total VOC content (lb/gal), the individual and total HAP contents (lb/gal), and the identified HAPs. The inventory shall be supported by Material Safety Data Sheets (MSDS) supplied by the manufacturer. **[Rule 62-4.070(3), F.A.C.]**

**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**

3.2 Operating Records: The permittee shall maintain the following records for at least five (5) years:

- (a) For each type of VOC or HAP-containing coating used, daily records of coatings received on site (purchase records);
- (b) For each type of VOC or HAP-containing solvent used, daily records of solvent received on site (purchase records);
- (c) The date and amount of all materials, that contain volatile organic compounds (VOCs) and/or hazardous air pollutants (HAPs), received on site which are not tracked under (a) or (b) above. **[Rule 62-4.070(3), F.A.C.]**

*{Permitting Note: The permittee may elect to use an electronic recordkeeping system in the format of either a spreadsheet or database provided records can be generated when requested by the Health Department.}*

3.3 VOC Monitoring: The permittee shall develop and implement a compliance monitoring protocol in conjunction with the emissions inventory (**Specific Condition 3.1** of this Section) and the operating records (**Specific Condition 3.2** of this Section) requirements of this permit.

As a minimum, the VOC compliance monitoring protocol shall include calculations of 12 consecutive months, rolling total emissions of VOC. The permittee shall maintain a monthly report on or before the 30<sup>th</sup> of the next month, to summarize the facility-wide emissions of VOC for current month. The report shall also include any updates to the product constituent information provided in the respective Material Safety Data Sheets (MSDS).

As long as the emissions of 12- consecutive months rolling total of VOC remains below 80 tons, the permittee shall continue monitor VOC emissions on a monthly basis (12 months consecutive rolling total).

If and when the 12- consecutive months rolling total of VOC exceeds 80 tons, the permittee shall notify Health Department and **immediately** implement weekly monitoring of VOC emissions (rolling 52-week total). The permittee shall prepare the 52-weekly data from the monthly data, recorded according to **Specific Condition 4.1** of this Section. While operating under the weekly monitoring protocol, the permittee shall calculate weekly emissions of VOC by the third day of the next week. The permittee shall adjust operations, as needed, to maintain compliance with the **Specific Condition 2.1** of this Section. When the rolling 52-week total for VOC remains below 80 tons for 4 consecutive weeks, the permittee shall contact the Health Department to request re-instatement of the monthly monitoring protocol. **[Rule 62-4.070(3), F.A.C.]**

3.4 Individual HAPs Monitoring: On or before the 30<sup>th</sup> of each month, the permittee shall calculate the facility-wide emissions of individual HAP for the previous 12 consecutive months, rolling total. As long as the emissions of 12- consecutive months rolling total of each individual HAP remains below 8 tons, the permittee shall continue monitor individual HAP emissions on a monthly basis (12 months consecutive rolling total).

If and when the 12 consecutive months rolling total of any individual HAP exceeds 8 tons, the permittee shall notify Health Department and **immediately** implement weekly monitoring of individual HAP emissions (rolling 52-week total). The permittee shall prepare the 52-weekly data from the monthly data, recorded according to **Specific Condition 4.1** of this Section. While operating under the weekly monitoring protocol, the permittee shall calculate weekly emissions of individual HAP by the third day of the next week. The permittee shall adjust operations, as needed, to maintain compliance with the **Specific Condition 2.2** of this Section. When the rolling 52-week total for individual HAP remains below 8 tons 4 consecutive weeks, the permittee shall contact the Health Department to request re-instatement of the monthly monitoring protocol. **[Rule 62-4.070(3), F.A.C.]**

3.5 Combined HAPs Monitoring: On or before the 30<sup>th</sup> of each month, the permittee shall calculate the facility-wide emissions of all HAPs for the previous 12 consecutive months, rolling total. As long as the 12 consecutive months rolling total of the combined HAPs remains below 20 tons, the permittee shall continue monitor combined HAP emissions on a monthly basis (12 months consecutive rolling total).

If and when the 12 months consecutive rolling total of the combined HAPs exceeds 20 tons, the permittee shall notify the Health Department and immediately implement weekly monitoring of the combined HAP emissions (rolling 52-week total). The permittee shall prepare the 52-weekly data from the monthly data, recorded according to **Specific Condition 4.1** of this Section. While operating under the weekly monitoring protocol, the permittee shall calculate weekly combined HAP emissions by the third day of the next week. The permittee shall adjust operations, as needed, to maintain compliance with the **Specific Condition 2.3** of this Section. When the rolling 52-week total for combined HAPs remains below 20 tons for 4 consecutive weeks, the permittee shall contact the Health Department to request re-instatement of the monthly monitoring protocol. **[Rule 62-4.070(3), F.A.C.]**

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**SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS**

- 3.6 Special Compliance Tests: When the Health 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 DEP rule or permit is being violated, it shall 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 Health Department. **[Rule 62-4.070(3), F.A.C.]**

**4.0 REPORTING AND RECORDKEEPING REQUIREMENTS**

- 4.1 Monthly Emission Records: The permittee shall maintain monthly emission records, on before the 30<sup>th</sup> of next month, to summarize site-wide emissions of VOC, individual HAP, and total HAPs for the current month and previous 12 months. These records shall include, as a minimum, the monthly emissions and the previous 12- consecutive months rolling total emissions of VOC, individual HAP and total HAPs.

The record shall also include any updates to the emissions factors used to calculate emissions and the effective date of the emission factor usage. In addition, the records shall include a summary of the raw material usage (Production & Clean-up), production emissions, clean-up emissions, and equipment emissions (Fugitives). These records shall be kept on site for a period of no less than five years and be made available to the Health Department representatives upon request. **[Rule 62-4.070(3), F.A.C.]**

- 4.2 Monthly Filter Maintenance Records: The Permittee shall maintain the monthly records of filter maintenance. The filters shall be maintained according to the Manufacturer's specifications. The records shall contain the information related to repairs, changes and routine inspections of the filters. Specifications of the Manufacturer shall be made available to the Health Department representatives upon request. **[Rule 62-4.070(3), F.A.C.]**

LIST OF APPENDICES

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<b>APPENDIX</b>	<b>DESCRIPTION</b>
A	General Permit Conditions.
B	Citation Format.
C	Insignificant and Exempt Activities

**DRAFT**

## APPENDIX A: GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither 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 is not a waiver 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.
- G.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.
- G.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.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as 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.
- G.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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor 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.

- G.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 non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

- G.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 prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

## APPENDIX A: GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.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.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology;
  - (b) Determination of Prevention of Significant Deterioration; and
  - (c) Compliance with New Source Performance Standards.
- G.14 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 or 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:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 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 that 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.

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**APPENDIX B. CITATION FORMAT**

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, ID numbers, and permit numbers.*

Guidance Memorandums from the Bureau of Air Regulation, Florida Department of Environmental Protection:

*Example:*        **[DARM-PER/GEN-12]** *(Refers to a specific, numbered guidance memorandum.)*

Florida Administrative Code (F.A.C.) Regulations:

*Example:*        **[F.A.C. 62-4.070]**

*Where:*        62            - Title 62  
                  62-4         - Chapter 62-4  
                  62-4.070   - Rule 62-4.070

Code of Federal Regulations:

*Example:*        **[40 CFR 60.334]**

*Where:*        40            - Title 40  
                  CFR         - Code of Federal Regulations  
                  60           - Part 60  
                  60.334     - Rule 60.334

New Permit Numbers:

*Example:*        099-0333-002-AC, or  
                         099-0333-001-AO

*Where:* AC        - Air Construction Permit  
                  AO         - Air Operation Permit  
                  099       - Number code identifying the facility is located in Palm Beach County  
                  0333     - 4-digit facility identification number assigned by permit tracking database  
                  001 or 002 - 3-digit sequential file number assigned by permit tracking database

Old Air Permit Numbers:

*Example:*        AC50-123456

*Where:* AC        - Air Construction Permit  
                  AO         - Air Operation Permit  
                  123456   - 6-digit sequential file number assigned by permit tracking database.

## APPENDIX C. EXEMPT ACTIVITIES

*The following items have been identified by the permittee as emitting negligible amounts of air pollution and are exempt from the requirements to obtain an air pollution permit.*

<b>Description of Equipment or Activity</b>	<b>Insignificant / Exempt</b>
Six (6) Jet Dust Collectors	Emissions from wood milling operations controlled by five 1.5 hp dust collectors and one 5 hp dust collector. Insignificant particulate matter (PM) emissions internally vented.
Hardware Prep Station	Emissions from small routers and drills controlled by dust collector bags attached to individual equipments and/or shop-vac canisters. All internally vented.
Propane fork lift	One fork lift powered by propane gas. These emissions are insignificant.

**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, FL 33487

Air Permit File Number 0990704-001-AF

Palm Beach County, Florida

Florida Department of Health, Palm Beach County  
Division of Environmental Public Health

October 21, 2013

**1.0 APPLICATION INFORMATION**

**1.1 Applicant**

Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, Florida 33487

*Authorized Representative:*  
Jeff Canter, Vice President of Operations

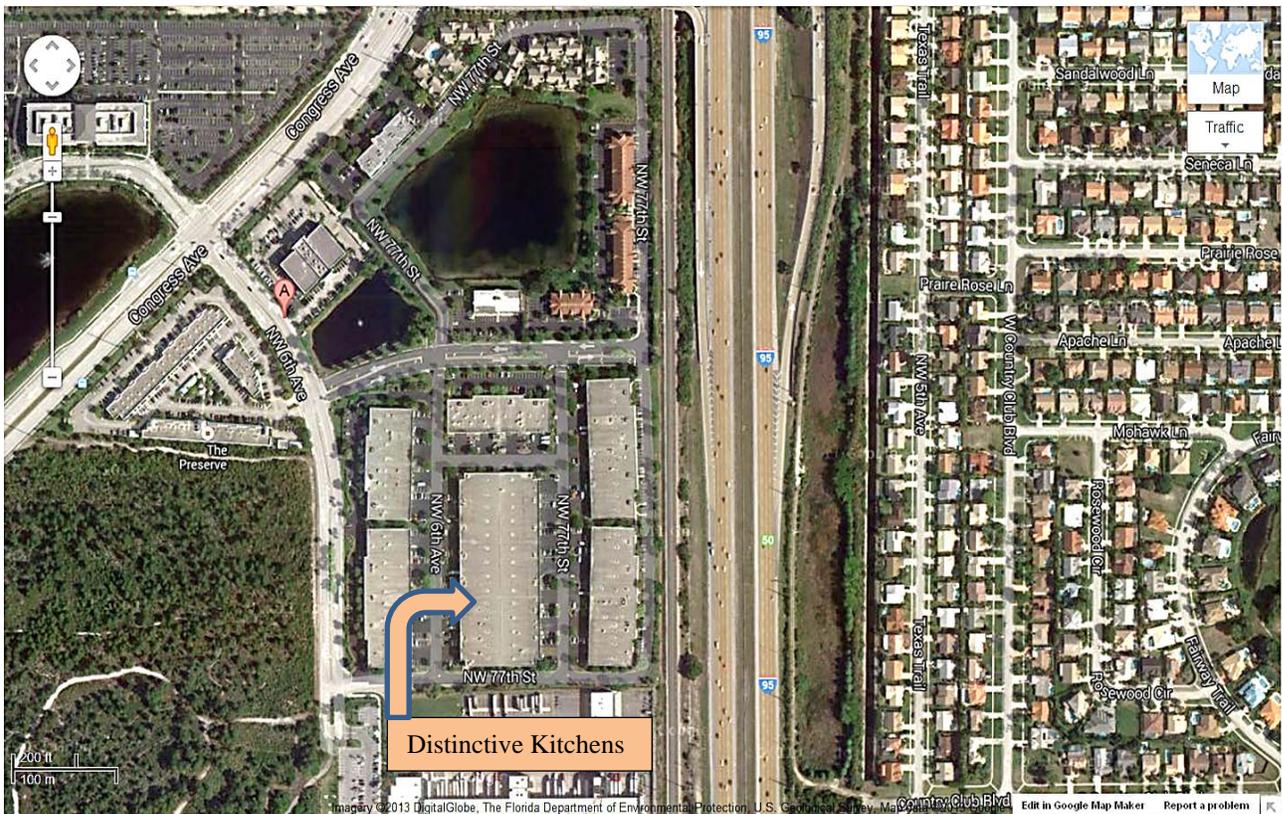
**1.2 Application Review**

09-06-2013: Health Department received application for operation Permit (FESOP).  
09-10-2013: Health Department received the correct application fee.

**2.0 FACILITY INFORMATION**

**2.1 Location**

Distinctive Kitchens  
7662 N.W. 6<sup>th</sup> Avenue  
Boca Raton, Florida 33487  
UTM: Zone 17; 590.482 km E; 2922.14 km N



2.2 Standard Industrial Classification Code (SIC #2511)

<i>Major Group Number</i>	25	Furniture and Fixtures
<i>Industry Group Number</i>	251	Household Furniture
<i>Industry Number</i>	2511	Wood Household Furniture, Except Upholstered.

North America Industry Classification Code (NAICS: 337122)  
 Nonupholstered Wood Household Furniture Manufacturing

2.3 Regulatory Classification

- Title III: The facility is not a major source of hazardous air pollutants (HAPs)
- Title IV: The facility will not operate units subject to the acid rain provisions of the Clean Air Act.
- Title V: The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- PSD: The facility is not classified as a PSD source in accordance with Rule 62-212.400 F.A.C
- RACT: The facility is not subject to any RACT requirements in accordance with Chapter 296, F.A.C.
- NSPS: The facility is not subject to any requirements of 40 CFR 60.
- NESHAP: The facility is subject to the requirements of 40 CFR 61, Subpart M, Asbestos.

**3.0 PROJECT DESCRIPTION**

Distinctive Kitchens is a custom cabinet and millwork manufacturer facility that supplies high-end residential and commercial bathroom cabinets, kitchen cabinets and interior door products. The facility is located in an industrial park consisting of commercial – light manufacturing buildings. Distinctive Kitchen occupies about half of one building with a total area of about 55,000 square feet.

The facility conducts product coating operations in three spray paint booths -- pre-fabricated by Global Finishing Solutions. The painting operation will utilize both conventional pressure spray guns and a high velocity and low pressure (HVLP) paint delivery system with average transfer rate of 70%. The three spray paint booths are equipped with a bank of fabric filters with a rated removal efficiency of over 99 percent for particulates.

The application requested a federally enforceable, facility-wide operation permit which would limit potential emissions of regulated pollutants to below Title V applicability thresholds. Distinctive Kitchens is a custom cabinet and millwork manufacturer facility that supplies high-end residential and commercial bathroom cabinets, kitchen cabinets and interior door products. The facility is located in an industrial park consisting of commercial – light manufacturing buildings.

The operation is a source of volatile organic compounds (VOC) and hazardous air pollutants (HAP). The applicant has requested the emissions of volatile organic compounds (VOC), individual HAP, and total HAPs to 95 tons per year (TPY), 9.5 tons per year, and 24.5 tons per year respectively. The predominant HAP from this facility is Toluene.

**4.0 RULE APPLICABILITY**

The proposed project is subject to preconstruction review under the applicable provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). This facility is located in Palm Beach County, an area designated as "maintenance" for the pollutant ozone and attainment for all other criteria pollutants in accordance with Rule 62-204.340, F.A.C. The proposed project is exempt from review under Rule 62-212.400 F.A.C., Prevention of Significant Deterioration (PSD), because this

new source is considered “minor” for the purpose of PSD regulations (having a potential to emit less than 250 tons per year of a regulated pollutant).

The facility is subject to the following air pollution control provisions:

F.A.C. Chapter 62--	Permitting Requirements.
F.A.C. Chapter 62--	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
F.A.C. Chapter 62-210	Required Permits, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
F.A.C. Chapter 62-212	General Preconstruction Review Requirements, PSD Requirements
FF.A.C. Rule 62-296	General Pollutant Emission Limiting Standards.
F.A.C. Rule 62-297	Test Methods
F.A.C. Chapter 62-256	Open Burning and Frost Protection Fires
F.A.C. Rule 62-257	Asbestos Program

And the following National Emission Standards for Hazardous Air Pollutants

- 40 CFR 61, Subpart M. - Asbestos

**5.0 SOURCE IMPACT ANALYSIS**

The majority of the emissions from this source result from the coatings and solvents used in the surface coating operations. Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions are generated by the various coatings and cleaning solvents used at this facility. The estimated VOC and HAP emissions are based on anticipated product consumption and constituent information provided in the respective Material Safety Data Sheets (MSDS). The emission calculations assume 100 percent evaporation of the volatile constituents. The results are summarized in Table 5.1.

**Table 5.1 Summary Potential to Emit from Kitchen and Bathroom Wood Coating Operations**

Pollutant	Allowable Emissions (Tons Per 12-Consecutive months)
VOC	95
Styrene	9.5
Toluene	9.5
Methanol	9.5
Any Individual HAP	9.5
Total HAPs	24.5

*Data was obtained from air permit application (EPSAP #3588-1).*

*Per applicant’s request, the emissions of VOCs, individual HAP and total HAPs are limited to 95 tons per year, 9.5 tons per year, and 24.5 tons per year, respectively. The compliance averaging period is any 12-consecutive weeks, rolling total. If the facility exceeds 80% of the emissions thresholds, then the permittee shall immediately start monitoring the emissions on a weekly basis.*

The Florida Department of Environmental Protection regulates major air pollution sources in accordance with Florida’s Prevention of Significant Deterioration (PSD) program, as approved by EPA in Florida’s State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required only in areas currently in attainment with the National Ambient Air Quality Standards (NAAQs) or areas designated as “unclassifiable”

for a given pollutant.

A facility is considered “major” with respect to PSD if it emits or has the potential to emit:

- >250 tons per year of any regulated pollutant, or
- >100 tons per year of any regulated pollutant and belonging to one of 28 PSD Major Facility Categories, or
- > 5 tons per year of lead

For new PSD-major facilities, each regulated pollutant is reviewed for PSD applicability based on the PSD Major emission thresholds listed above. Net emission increases exceeding these rates are considered “significant” and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each pollutant and evaluate the air quality impacts. Although a facility may be “major with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

As the potential emissions of all the criteria pollutants from this source are below the PSD Major threshold of 250 tons per year, this source is classified as a natural PSD minor source of air pollution and is not subject to PSD preconstruction review requirements

At the request of the applicant, the emissions of Toluene and each HAP are capped at 9.5 tons per any 12- consecutive months, rolling total and the potential emissions of total HAPs are limited to 24.5 tons per any 12- consecutive months, rolling total. VOC emissions are capped at 95 tons per any 12- consecutive months rolling total. This facility is classified as a synthetic minor source under the Title III - Hazardous Air Pollutant Program of the Clean Air Act Amendments. As a synthetic minor source of hazardous air pollutants, this facility will not be subject to the requirements of 40 CFR 63, Subpart JJ- “National Emissions Standards for Wood Furniture Manufacturing.” In addition, this facility is not a major source of air pollution with respect to the Title V operating permit program.

At the request of the applicant, the permittee shall maintain a monthly emissions report, on or before the 30<sup>TH</sup> of each month, to summarize facility-wide emissions of VOC, individual HAP, or total HAPs. The report shall include, as a minimum, the monthly emissions and the 12 consecutive months rolling total emissions for VOC, individual HAP and total HAP. The report shall also include any updates to the product constituent information provided in the respective Material Safety Data Sheets (MSDS).

**6.0 AIR QUALITY MODELING ANALYSIS**

Analysis of Toluene emissions from this facility are modeled using the AERMOD (ver 8.2). Following input data was used in modeling.

Source of Information		Location		Exhaust Parameters					Emission Rates
	Type	UTM E	UTM N	Base Elev	Stack	Dia.	Flow	Temp	Toluene
				(ft)	(ft)	(ft)	(cfm)	(F)	(lb/hr)
EU001-1	Point	590514	2922155	8	30	3.33	20000	80	3.04
EU001-2	Point	590514	2922140	8	30	2.83	10000	80	3.04
EU001-3	Point	590514	2922128	8	30	2.83	10000	80	3.04
Building Parameters									
	SW coord - UTM X	SW Coord UTM - Y	Base Elev (ft)	length (m)	width (m)				
Bldg. 1	590479.7	2922004	13	169	75				

Emissions Rate Estimation			
	EU 1	EU 2	EU 3
tpy	3.17	3.17	3.17
hrs	2080	2080	2080
lb/hr	3.04	3.04	3.04

The emissions rate from each painting booth is estimated based on total Toluene emissions of 9.5 tons per year (allowable limit) and 2080 hrs. (40 hr. of operation per week) [9.5 x 2000/3/2080]

**Based on the emissions rate of 3.04 lb/hr from each booth, the highest concentration of Toluene was found to be 0.38 ppm, which is below the Toluene odor threshold of 2.9 ppm.**

**7.0 CONCLUSION**

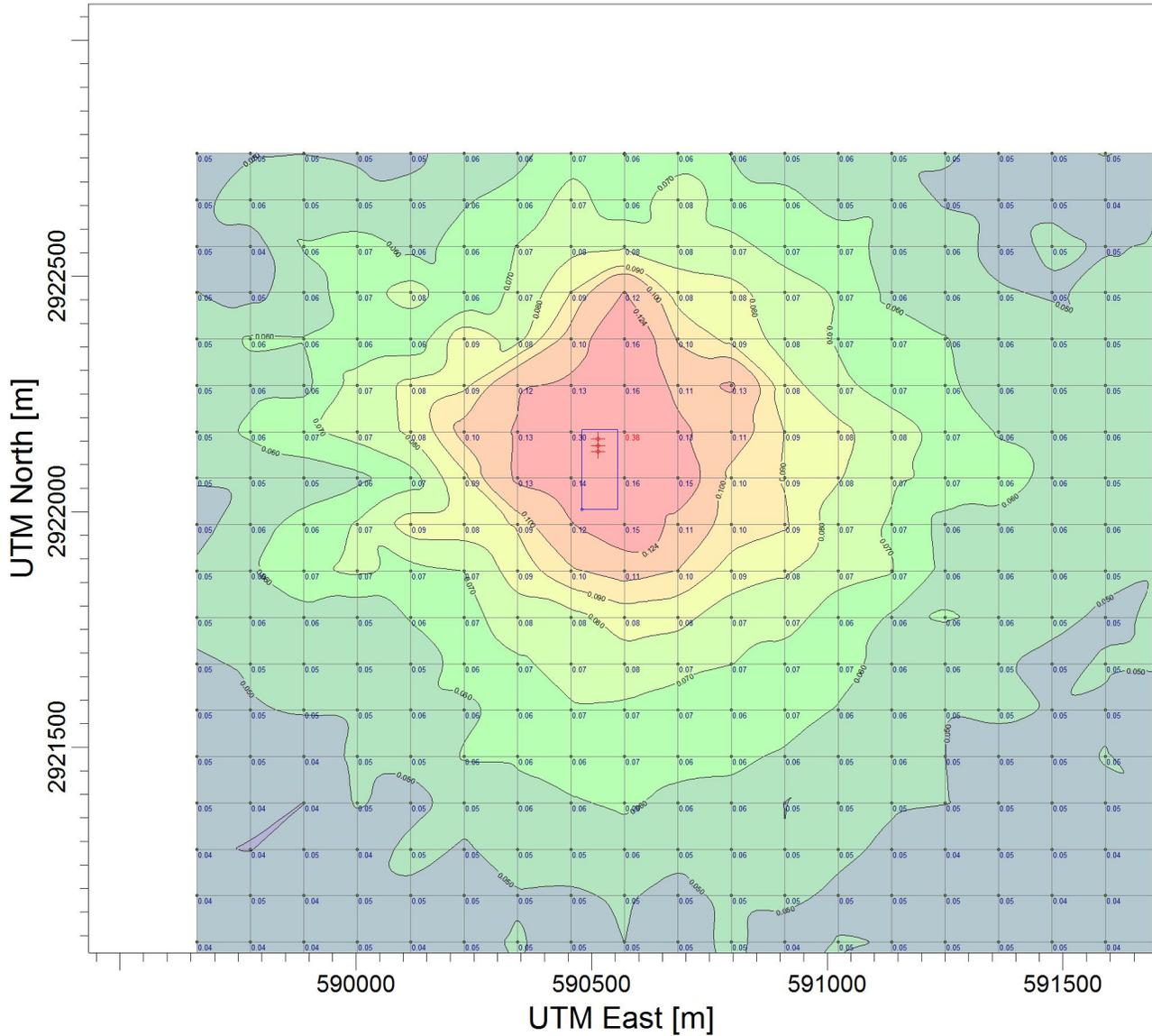
Based on the information provided by the applicant, the Health Department has a reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions in the proposed draft permit, will not cause or significantly contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 62-209 through 62-297 of the Florida Administrative Code.

**[Rule 62-4.070(1), F.A.C.]**

*Permit Engineer: Paul Kalamaras, Engineering Specialist III, and Laxmana Tallam, P.E.*

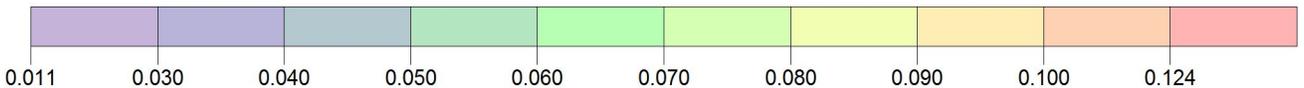
*Filename: 0990704-001-AF\_Distinctive Kitchens\_Draft\_TE*

PROJECT TITLE:  
**Distinctive Kitchens - 0990704**  
**Modeling for Odor Threshold for Toluene**



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: ALL

PPM



COMMENTS:

The highest concentration of Toluene is found to be 0.3754 ppm, which is less than the odor threshold of Toluene (2.9 ppm)

SOURCES:

**3**

RECEPTORS:

**441**

OUTPUT TYPE:

**Concentration**

MAX:

**0.3754 PPM**

COMPANY NAME:

**Distinctive Kitchens - 0990704**

MODELER:

**Laxmana Tallam**

SCALE:

1:14,395

0  0.5 km

DATE:

**10/17/2013**

PROJECT NO.:

