FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

RICK SCOTT
GOVERNOR

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LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

Electronically Sent- Received Receipt Requested
JMurfin@Dccabinetry.com

FINAL PERMIT

PERMITTEE

Designers Choice Cabinetry
100 TGK Circle
Rockledge, FL 32955

Authorized Representative:
Jim Murfin, President/CEO

Air Permit No. 0090245-001-AC
as modified by 0090245-004-AC
Permit Effective Date: 04/29/2014
(modification effective 12/18/2014)
Permit Expires: December 30, 2016
Site Name: Designers Choice Cabinetry
Major Source Air Construction Permit
Project Name: Initial Construction Permit

This is the initial Air Construction Permit for the facility. Designer's Choice Cabinetry (Standard Industrial Classification No. 2434) is located in Brevard County at 100 TGK Circle in Rockledge, Florida. The UTM coordinates are Zone 17, 527.37 km East, and 3132.78 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

F. Thomas Lubozynski, P.E. — December 18, 2014
Waste & Air Resource Programs Administrator — Date

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 December 18, 2014 to the persons listed below.

Mr. Jim Murfin, President/CEO (JMurfin@Dccabinetry.com)
Mr. Chuck Reinbold, Director (CReinbold@Dccabinetry.com)
Mr. Alan Zahm, P.E., Consolidated Environmental Engineering, LLC, (alanzahm@embarqmail.com)
Mr. Roger T. Caldwell, Consolidated Environmental Engineering, LLC, (surfrtc@gmail.com)
Mr. Jeff Rustin, P.E., FDEP – Central District, (jeff.rustin@dep.state.fl.us)

Clerk Stamp

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

(Clerk) — December 18, 2014 (Date)

FACILITY AND PROJECT DESCRIPTION

Designers Choice Cabinetry

Designers Choice Cabinetry is a manufacturer of wood cabinets.

The existing facility consists of the following emissions unit.

Facility ID No. 0090245	
ID No.	Emission Unit Description
001	Wood Furniture (Cabinets) Surface Coating Operation.

Facility consists of 4 existing paint spray booths, 2 of which are automated; a new hang line coating system with 3 new paint spray booths; a natural gas heated oven; and cutting and sanding operations.

Project Description

This project is the Initial Air Construction Permit for the existing facility.

The facility had no air permit previously. A site inspection and review of the facility's records showed the facility is required to have an air permit.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of air pollution for volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V 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.

PERMIT HISTORY/AFFECTED PERMITS

This is the initial air construction permit for the facility. The facility had no air permit previously.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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

   Florida Department of Environmental Protection
   Central District Office
   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 or electronically to the following address: DEP_CD@dep.state.fl.us . In each document, clearly identify the Air Permit Project No. 0090245-001-AC.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address.) In each document, clearly identify the Air Permit Project No. 0090245-001-AC and specific emission unit.

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 Test Conditions;
   e. Appendix E. 40 CFR Part 63, Subpart A, General Provisions;
   f. Appendix F. 40 CFR Part 63, Subpart JJ, Wood Furniture Manufacturing Operations; and
   g. Appendix G. Site Plan and Flow Diagram

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: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports (AORs) shall be submitted electronically to the Compliance Authority by April 1st of each year. The first submittal is due not later than 4/1/2015. Go to the following website for the latest information about electronic submittal of AORs:

   http://www.dep.state.fl.us/air/emission/eaor/default.htm

   The Title V annual emissions fees will be automatically calculated based on the annual emissions reported on the AOR. Pay the Title V annual emission fees accordingly.

   [Rule 62-210.370(3), F.A.C.]

8. Operation Permit Application: **A Title V Air Operation Permit** is required for this facility. A completed application for an initial Title V air operation permit shall be submitted to the Permitting Authority at least 90 days prior to expiration of this permit. The Operation Permit Application may include the construction authorized by this permit 0090245-004-AC, as well as, 0090245-002-AC. To properly apply for a Title V Air Operation Permit, the applicant shall submit the following:
   a. Application for Air Permit – Long Form (DEP Form No. 62-210.900(1)), which can be found at: http://www.dep.state.fl.us/air/rules/forms/application.htm . The applicant may apply electronically using the EPSAP (Electronic Permit Submittal and Processing) system and use EPSAP – Long Form, which can be found at: http://www.floridadep.org/air/emission/epsap/default.htm ;
   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
   c. copies of the most recent two months of records/logs specified in Specific Condition No. **A.9.**
   d. copies of the logs specified in condition number 10 below.

   [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.]

   {Permitting Note: Typically there are no processing fees associated with an initial Title V Air Operation Permit Application.}

9. Unconfined Emissions of Particulate Matter: No person shall 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, handling; without taking reasonable precautions to prevent such emissions. Pursuant to Rule 62-296.320(4) (c)1., 3 and 4., F.A.C., reasonable precautions to prevent unconfined emissions of particulate matter at this facility include the following requirements:

a. Conduct an EPA Method 22 observation monthly on the baghouse dust collectors.
b. Maintain a log to record maintenance items on a monthly basis, including filter replacements for the paint booths and bag filters from the baghouse dust collectors.
c. Sweep the parking lot on a monthly basis.

10. Recordkeeping Log: In order to demonstrate compliance with Condition **9.a.** and **9.b.** (Administrative Requirements), the permittee shall maintain a log for a period of at least 5 years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

a. Facility Name, Facility ID No. (i.e., 0090245);

b. Month and year of record;

c. Record observation details from each EPA Method 22 observation; and

d. Record maintenance items on a monthly basis, including filter replacements for the paint booths and bag filters from the baghouse dust collectors.

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

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU No. 001 – Wood Furniture (Cabinets) Surface Coating Operation

This section of the permit addresses the following emission unit.

ID No.	Emission Unit Description
001	Wood Furniture (Cabinets) Surface Coating Operation

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

A.2. VOC Emissions: Pursuant to Rule 62-296.320(1)(a), F.A.C., the following procedures shall be used to minimize emissions:

a. Maintain tightly fitting cover, lids, etc. on all containers of VOCs when they are not being handled, used, etc.;

b. All equipment, fittings, valve lines, pipes, drums, tanks, etc. shall be properly operated and maintained;

c. Prevent excessive air turbulence across exposed VOCs; and

d. All VOC spills shall be attended to immediately and waste properly disposed, recycled, etc.

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

A.3. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. 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. [Rules 62-210.200(214) and 62-296.320(2), F.A.C.]

EMISSIONS STANDARDS

A.4. VOC Emission Limitations: The maximum facility-wide VOC emissions are limited as follows:

Pollutant	Emission Limits (tons per any consecutive 12 month period
Total Volatile Organic Compounds (VOCs)	Less than 243

[Rules 62-4.070(3) and 62-210.200(247), Potential to Emit, F.A.C.]

{Permitting Note: HAP (Hazardous Air Pollutant) emissions are controlled by meeting the emission limits of Table 3 to 40 CFR Part 63, Subpart JJ, Wood Furniture Manufacturing Operations.}

A.5. Visible Emissions Limitation (Facility, except baghouse dust collectors): Visible emissions from each particulate emissions source, except for the baghouse dust collectors, are limited to less than 20 percent opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

A.6. Visible Emissions Limitation (Baghouse dust collectors): Visible emissions from the baghouse dust collectors, are limited to less than 5 percent opacity.
[Rule 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

A.7 Conduct an EPA Method 22 observation monthly for the baghouse dust collectors.
[Rule 62-4.070(3), F.A.C.]

A.8. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
EPA Method 22	Visual Determination of Fugitive emissions from Material Sources and Smoke emissions from Flares

The above method is described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.401, F.A.C. and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

A.9. Monthly Log: In order to demonstrate compliance with Specific Condition No. **A.4.,** the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall be made available to the Department upon request. The log shall contain the following:

a. Facility Name, Facility ID No. (i.e., 0090245);

b. Month and year of record;

c. Most recent monthly total of VOC emissions (tons);

d. Most recent monthly total of total HAP emissions and individual HAP emissions (tons);

e. Most recent consecutive 12-month total of VOC emissions (tons); and

f. Most recent consecutive 12-month total of total HAP emissions and individual HAP emissions (tons).

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

A.10. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.9.** (previous condition) must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those to used to derive emissions, must be clearly documents, and may be presented in the form of a template of sample calculations and available for review on site by the Department.
[Rule 62-4.070(3), F.A.C.]

A.11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, "As Supplied" sheets, Safety Data Sheets, EPA data sheets, purchase orders, waste shipment/disposal records, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions for a minimum of five (5) years and made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

A.12. Record Retention: The records required in Specific Condition No. **A.9.** shall be recorded in a permanent form suitable for inspection and made available to the Department upon request. The records shall be maintained onsite for a minimum of five (5) years.
[Rule 62-4.070(3), F.A.C.]

A.13. Log Submittal to Central District Compliance Assurance Program and Application Submittal: Submit a copy of the monthly log (Condition **A.9.**) to the Central District Compliance Assurance Program for the first three consecutive complete months after the final air construction permit (Permit No. 0090245-001-AC) is issued. The monthly log submittal shall occur no later no later than the last day of the fourth consecutive complete month after the final construction permit is issued. After the Central District Compliance Assurance Program has determined that the logs are satisfactory, an email will be sent to Designers Choice Cabinetry indicating approval of the logs. A completed application for an initial Title V air operation permit shall be submitted to the Permitting Authority no later than 60 days after receiving the log approval email from the Central District Compliance Assurance Program.
[Rule 62-4.070(3), F.A.C.]

A.14. List of Coatings and Solvents: A list of coatings and solvents used by the facility for each calendar year shall be submitted annually to the Central District Compliance Assurance

Program, not later than March 1 of the following calendar year. For each coating and solvent used, include the following information, at a minimum:

a) the product name;
b) product density (lb/gal);
c) the VOC content (lb/gal); and
d) the ratio of volatile HAPs to solids (maximum lb VHAP/lb solids) as applied.

For reasonable assurance, the list must be accompanied by a statement whether all coatings and solvents met the emission limits in Table 3 to Subpart JJ of 40 CFR Part 63.
[Rule 62-4.070(3), F.A.C. and Table 3 to Subpart JJ of 40 CFR Part 63]

Other Requirements

A.15. Federal Rule Requirements In addition to the specific conditions listed above, Emissions Unit No. 001 is also subject to the applicable requirements contained in 40 CFR 63, Subpart A– General Provisions and 40 CFR 63, Subpart JJ– Wood Furniture Manufacturing Operations. The conditions of Subpart A and Subpart JJ (primarily Table 3 to Subpart JJ) are incorporated into this permit (attached and part of this permit, See Appendices).
[Rule 62-213.440, F.A.C.]