TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Avon Cabinet Corporation
5821 24th St. East, Bradenton

Facility ID No. 0810240

PROJECT

Project No. 0810240-001-AC
Application for Minor Air Construction Permit
Project Name: Wood Cabinet Manufacturing

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-0926

February 13, 2014

Prepared by Quaid Noor

GENERAL PROJECT INFORMATION

Air Pollution Regulations

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

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

Glossary of Common Terms

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

I. Facility Description:

The existing facility manufactures wooden kitchen and bath cabinets. It consists of woodworking equipment to fabricate and assemble wood components as well as finishing lines to apply coatings such as stains, glazes, toners, sealers, and topcoats. Dust generated in cutting, drilling, shaping and grinding operations is captured by three baghouses and vented outside. Hazardous air pollutants (HAPs) and volatile organic compound (VOC) emissions throughout the surface coating operations are emitted fugitively.

II. Project Description:

A. Applicant:

Mark Page, Vice President
Avon Cabinet Corporation
5821 24th St. East
Bradenton, FL 34203

B. Professional Engineer:

Timothy E. Denhof, P.E
Vanguard Environmental, Inc.
240 E. Lake Street, Suite 101
Addision, Illinois 60101

C. Project Location:
5821 24th St. East
Bradenton, FL 34203

D. Project Summary:

Initial air construction permit for the operation of an existing wood cabinet manufacturing operation, as further described in the permit.

E. Application Information:

Application Received on: 01/13/2014
Additional Information Requested on: 01/28/2014
Additional Information Received on: 02/27/2014
Application Complete on: 02/27/2014

III. Applicable State and Federal Regulations

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

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	grinding and cutting could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Surface coating operations are a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Manatee County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	Manatee County is not a nonattainment area or area of influence for PM
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	facility is not subject to 40 CFR 63, Subpart JJ as it is not a major source
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required initially once and then once prior to permit renewal.

IV. Summary of Emissions

EU No. and brief description
001 - Woodworking Operations
002 - Surface Coating Operations

Pollutant	EU No.	Potential Emissions (tons/year)	Allowable Emissions (tons/year)
PM	001	0.675	n/a
VOC	002	24.9	24.9
Total HAPs	002	24.9	24.9
Individual HAP (Toluene)	002	9.5	9.5
VE Limitation			
VE	001		5%

V. Conclusions

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

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

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).