FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
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HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMIT

PERMITTEE

Avon Cabinet Corporation
5821 24th St. East
Bradenton, FL 34203

Authorized Representative:
Mr. Mark Page, Vice President

Air Permit No. 0810240-001-AC
Permit Expires: 12/31/2015
Avon Cabinet Corporation
Minor Air Construction Permit
Wood Cabinet Manufacturing

This is the final after-the-fact air construction permit for the existing Avon Cabinet Corporation's wood cabinet manufacturing facility. The facility (Standard Industrial Classification No. 2434) is located in Manatee County at 5821 24th St. East in Bradenton, Florida. The UTM coordinates are Zone 17, 348.48 km East, and 3035.80 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 (Mail Station #35, 3900 Commonwealth Boulevard, 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

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Kelley M. Boatwright — Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination), 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 the date indicated below to the persons listed below.

Mark Page, President, Avon Cabinet Corporation, markp@avoncabinet.com

Becky Pridgen, Avon Cabinet Corporation, beckyp@avoncabinet.com

Timothy E. Denhof, P.E, Vanguard Environmental, Inc., tdenhof@vanguardenvl.com

Erin DiBacco, Florida Department of Environmental Protection SWD (erin.dibacco@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility manufactures wooden kitchen and bath cabinets. It consists of woodworking equipment used to fabricate and assemble wood components as well as finishing lines used 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.

Project Description and Affected/Proposed Emission Units

This is an after-the-fact construction permit for a facility that began operation in April, 1999. The facility manufactures wooden kitchen and bath cabinets. This project will create the following emissions units (EUs).

EU ID No.	Emissions Unit Description
001	Woodworking Operations
002	Surface Coating Operations

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

{Permitting Note: Federal Regulatory Requirements – This facility is not subject to 40 CFR 63, Subpart JJ – National Emissions Standards for Wood Furniture Manufacturing Operations since it is not a major source as defined in 40 CFR 63, Subpart A, §63.2.}

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants VOC and HAP. The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

No previous air permits have been issued for this facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the

actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit - This permit authorizes initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after issuance of this permit. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

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

c. copies of the most recent compliance test reports required by Specific Condition No. A.9., if not previously submitted;

d. copies of the most recent month of records/logs specified in Specific Condition Nos. B.4.

The application shall be submitted to the Permitting Authority.
[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

A. EU No. 001 – Woodworking Operations

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	Woodworking Operations - Woodworking operations include wood machining, sanding, fastening and gluing. Equipment used in woodworking areas include numerous table saws, cutoff saws, planners, routers, sanders, drills, shapers, etc. Baghouse systems, LMC Baghouse east w/75 HP Blower, Torit Cyclone/Baghouse w/15 HP Blower, and LMC Baghouse west w/75 HP Blower are used to control particulate matter emissions. The removal efficiency of each of these baghouses is ≥ 99% for particulate matter (PM).

PERFORMANCE RESTRICTIONS

A.1. Restricted Operation - The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

A.2. Control Equipment – The permittee shall install, maintain, and operate a baghouse for all activities on each woodworking operation that exhausts process air containing wood shavings and/or sawdust to the outside air. The emissions from the woodworking operations shall be controlled by the baghouse.
[Rule 62-4.070(3) F.A.C.; Permit application dated 01/13/2014]

EMISSIONS STANDARDS

A.3. Visible Emissions Standard - The visible emissions from any baghouse exhausting to the outside air shall not exceed 5%. The Department shall waive the visible emissions (VE) testing provided that baghouses are installed, operated, and maintained to effectively control PM emissions. However, the Department may require VE testing if it has reasons to believe that the baghouses are not operating properly.
[Rule 62-210.650, F.A.C.; Permit Application dated 01/13/2014]

COMPLIANCE TESTING REQUIREMENTS

A.4. Initial Compliance Tests - The emissions unit's baghouses shall be tested to demonstrate initial compliance with the emissions standards for opacity. The initial tests shall be conducted no later than 90 days after issuance of this construction permit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.5. Compliance Tests After Initial Testing - The emissions unit's baghouses shall be tested to demonstrate compliance with the emissions standards for opacity 180 days before the expiration of the operation permit.
[Rule 62-297.310, F.A.C.]

A.6. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.7. Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

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

NOTIFICATION REQUIREMENTS

A.8. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A. C.

RECORDKEEPING AND REPORTING REQUIREMENTS

A.9. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

B. EU No. 002 – Surface Coating Operations

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
002	Surface Coating Operations – This emissions unit is comprised of seven (7) individual spray booths located throughout the facility. Each booth is equipped with its own dry filters and exhaust for ventilation. All spraying is carried out manually primarily with air assisted spray paint guns. Cabinet parts are moved, fixture and sprayed manually.

PERFORMANCE RESTRICTIONS

B.1. Restricted Operation - The hours of operation are not limited (8,760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.]

EMISSIONS STANDARDS

B.2. VOC/HAP Emission Limitations **-** In order to establish the facility as a non-Title V minor source of VOC and HAP emissions, the following emission limits shall apply facility-wide:

a. Hazardous Air Pollutants (HAPs) –

(1) Individual HAP emissions shall not exceed 9.5 tons in any 12 consecutive month period;

(2) Total combined emissions of all HAPs shall not exceed 24.9 tons in any 12 consecutive month period.

b. Volatile Organic Compounds (VOC) - Total combined emissions of all VOC shall not exceed 24.9 tons in any 12 consecutive month period.

(Permitting Note: *The Individual HAP and Total HAPs emissions limits of Specific Condition No. B.2. are very close to the Title V thresholds of 10 tons/year and 25 tons/year. Please be aware that if either of the Title V thresholds are exceeded, the facility will become a Title V and will be required to obtain a Title V permit.)*

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit Application received 01-13-2014]

B.3. Volatile Organic Compound Emissions and/or Organic Solvent Emissions - The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. all equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of solvent materials;

b. perform mixing/blending operations with vessel lids in place when practical;

c. tightly cover or close all VOC and/or solvent containing vessels, drums, totes, etc., when they are not in use;

d. immediately confine and clean up VOC and/or solvent spills, and ensure wastes are placed in closed containers for reuse, recycling or proper disposal; and

e. used cleanup solvents shall be captured and stored in closed containers and recycled or disposed of as required by the appropriate waste disposal regulations.

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

RECORDKEEPING AND REPORTING REQUIREMENTS

B.4. Monthly VOC and HAP Recordkeeping - The permittee shall keep monthly logs to document compliance with the VOC and HAP limitations of Specific Condition No. B.2. The logs may be based on the beginning and ending inventories, deliveries, shipments, etc. At the option of the permittee, "purchases" may be used instead of "usage" in determining VOC/HAP emissions, provided that no materials are used which are not purchased and the material is not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Avon Cabinet Corporation, 0810240, E.U. No. 001, Wood Cabinet Manufacturing);

b. month, year, and method used for records (usage or purchase);

c. monthly total quantity in gallons of each material (paint, solvent, etc.) that contain HAPs, and/or VOCs;

d. percentage by weight of each individual HAP and VOC for each material identified in c., above;

e. monthly total of individual HAP, total HAPs and VOC emissions (tons/month) based on c. and d. above; and

f. most recent 12 consecutive month period total of individual HAP, total HAPs and VOC emissions (tons/12 consecutive month period) based on f. above.

The monthly logs shall be completed by the 15th of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request. Supporting documentation (MSD sheets, purchase orders, emission factors, etc.) shall be kept for each VOC and HAP containing material.

(Permitting Note: *The Individual HAP and Total HAPs emissions limits of Specific Condition No. B.2. are very close to the Title V thresholds of 10 tons/year and 25 tons/year. Please be aware that if either of the Title V thresholds are exceeded, the facility will become a Title V and will be required to obtain a Title V permit.)*

[Rule 62-4.070(3), F.A.C.; Construction Permit Application Received 01/13/2014]