Masco Cabinetry LLC
Ocala Plant

Facility ID No. 0830137
Marion County

Title V Air Operation Permit Renewal

Permit No. 0830137-006-AV
(Renewal of Title V Air Operation Permit No. 0830137-005-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
Fax: (813) 632-7668

Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District

13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Telephone: (813) 632-7600
Fax: (813) 632-7668

Title V Air Operation Permit Renewal

Permit No. 0830137-006-AV

Table of Contents

Section **Page Number**

I. Facility Information.
A. Facility Description. 2
B. Summary of Emissions Units. 2
C. Applicable Regulations. 2

II. Facility-wide Conditions. 3

III. Emissions Units and Conditions.
A. EU Nos. 001 and 002 Cabinet manufacturing Lines 1, 2, 3 and 4 5
B. EU No. 004 Existing Emergency Fire Pump..... 9

IV. Appendices. 11
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP 40 CFR 63 Subpart A – General Provisions.
Appendix NESHAP 40 CFR 63 Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations.
Appendix NESHAP 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements
Appendix TV, Title V General Conditions.

Referenced Attachments. ..... At End
Statement of Basis
Table H, Permit History.

DRAFT/PROPOSED PERMIT

PERMITTEE:
Masco Cabinetry LLC
4600 Arrowhead Drive
Ann Arbor, Florida 48105

Permit No. 0830137-006-AV
Ocala Plant
Facility ID No. 0830137
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Ocala Plant is located in Marion County at 1300 SW 38th Avenue, Ocala, Florida. UTM Coordinates are: Zone 17, 384.48 East and 3227.92 North. Latitude is: 29° 10' 28.7" North; and, Longitude is: 82° 11' 17.1" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 2011
Renewal Application Due Date: March 20, 2013
Expiration Date: October 31, 2013*

Draft/Proposed

_____

Pamala Vazquez
District Program Administrator
Southwest District

*: *This facility has been under a long-term shutdown status since October 31, 2008. In accordance with Rule 62-210.300(2)(a)b., F.A.C., the operation permit shall be renewed for a period not to exceed five years from the date of shutdown*.

PLV/cz

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This is a wood furniture manufacturing facility that includes woodworking and finishing operations for the manufacturing of kitchen and bath cabinets.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Cabinet Manufacturing Finishing Lines 1, 2 and 3
002	Cabinet Manufacturing Finishing Line 4
004	Existing Emergency Fire Pump

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received June 1, 2011, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU Nos.
40 CFR 63, Subpart A - General Provisions	001 and 002
40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations	001 and 002
40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	004
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	001 and 002

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. 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" means 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 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The procedures to minimize pollutant emissions shall include the following:

a. Tightly cover or close all VOC containers when they are not in use;

b. Where possible, tightly cover all open troughs, basins, baths, tanks, etc. when they are not in use;

c. Maintain all piping, valves, fittings, etc. in good operating condition;

d. Prevent excessive air turbulence across exposed VOC/OS;

e. Immediately confine and clean up VOC/OS spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal; and

f. Maintain appropriate records to demonstrate compliance with VOC/HAP emission limits.

[Rule 62-296.320(1), F.A.C. and Construction Permit No. 0830137-003-AC]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined 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 or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Maintenance of paved areas as needed;

b. Regular mowing of grass and care of vegetation;

c. Limited access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees
See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.
[Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm.

[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.
[Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW10. Notification of Startup. Since the facility has been under a long-term shutdown status since October 31, 2008, the permittee shall notify the Department in writing of the intent to start up the facility, a minimum of 60 days prior to the intended startup date.

a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.

b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

Subsection A. Emissions Unit Nos. 001 and 002

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Cabinet Manufacturing Finishing Lines 1, 2 and 3
002	Cabinet Manufacturing Finishing Line 4

Finishing Lines 1-3

Finishing Lines 1, 2, and 3 are three identical finishing lines. Each finishing line consists of an overhead hanging conveyor system and a series of high-volume low pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. Specifically, each line consists of the following process areas and equipment:

- A pair of back-to-back spray booths for each application of toners, stains, sealers and topcoats (8 spray booths per line);
- A flash-off area following each pair of sealer and topcoat spray booths (2 flash-off areas per line);
- A gas-fired curing oven following each pair of toner, stain, sealer, and topcoat spray booths (4 ovens per line); and
- A cool-down area following each sealer and topcoat oven (2 cool-down areas per line).

Each conveyor line is designed for a maximum speed of approximately 16 feet per minute. Each line has a processing capacity of 865 cabinets per day based on current coatings, work flow, two shifts per day, and the maximum conveyor line speed.

The total maximum heat input rate of all curing ovens associated with Lines 1-3 is approximately 33 MMBtu/hr.

Finishing Line 4

Finishing Line 4 consists of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. Specially, this finishing line consists of the following process areas and equipment:

- A pair of back-to-back spray booths for the application of sap primer, toners, stains, sealers and topcoats (10 total booths);
- A flash-off area following each pair of sealer and topcoat spray booths (2 flash-off areas);
- A gas-fired curing oven following each pair of sap primer, toner, stain, sealer, and topcoat spray booths (5 ovens); and
- A cool-down area following each sealer and topcoat oven (2 cool-down areas).

The conveyor line is designed for a maximum speed of approximately 32 feet per minute and. The processing capacity of Line 4 is approximately 1800 cabinets per day based on current coatings, workflow, two shifts, and the maximum conveyor line speed.

The total maximum heat input rate of all curing ovens associated with Line 4 is approximately 18 MMBtu/hr.

Glaze Line

Glaze is a specialty coating applied only on a limited amount of orders. Finishing would begin on one of the four finishing lines with the application of toner and stain. The cabinet would then be pulled from that line and finished on the Glaze Line. The Glaze Line consists of the following process areas and equipment: glaze booth, flash-off area, and curing oven followed by a topcoat booth, flash-off area, curing oven, and cool-down area. The conveyor line speed is expected to be approximately 15 feet per minute.

Cabinets finished on the Glaze Line and associated emissions are attributed to the line that first began finishing the cabinet, either Lines 1-3 or Line 4.

Offline Booths

There are two offline systems, each consisting of a spray booth and curing oven. The offline spray booths see limited use in the repair of cabinets or finishing specialized parts. Cabinets finished in the Offline Booths and associated emissions are attributed to the line that first began finishing the cabinet or part, either Lines 1-3 or Line 4.

Generally, coatings are manually applied by operators in spray booths using high volume low-pressure (HVLP) spray equipment. NESHAP Subpart JJ also allows equivalent equipment such as air-assisted or airless spray equipment. Spray booths consist of three walls, a roof, and one open side for operator entry. Wood components are transferred between process areas by an overhead hanging conveyor system. A small rectangular opening in each end wall of each spray booth allows parts to enter and exit the booth on the conveyor line. Electric fans exhaust air from the process areas through roof stacks. Other areas along the conveyor line include hand operations such as stain wiping and sanding.

Essential Potential to Emit (PTE) Parameters

A.1. Fuel Limitation: Each curing oven shall only fire natural gas or propane.
[Construction Permit No. 0830137-003-AC]

A.2. Hours of Operation. These emissions units may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C., Construction Permit No. 0830137-003-AC]

A.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

A.4. VOC and HAP Emissions.

a. *Lines* 1-3: Total combined Volatile Organic Compound (VOC) emissions from Lines 1-3 shall not exceed 249.0 tons during any consecutive 12 months. Total combined hazardous air pollutant (HAP) emissions from Lines 1-3 shall not exceed 249.0 tons during any consecutive 12 months.

b. *Line* 4: Total VOC emissions from Line 4 shall not exceed 166.0 tons during any consecutive 12 months. Total hazardous air pollutant (HAP) emissions from Line 4 shall not exceed 166.0 tons during any consecutive 12 months.

[Rule 62-210.200 (PTE), F.A.C. and Construction Permit No. 0830137-003-AC]

Recordkeeping and Reporting Requirements

A.5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.6. Material Content Records. For each VOC and HAP containing material in use at the plant (sap primers, stains, toners, sealers, topcoats, cleaning agents, etc.), the permittee shall keep records that identify each chemical constituent, the corresponding amount used, recognition as a VOC, and recognition as a HAP. Supporting documentation (i.e., chemical usage tracking logs, Material Safety Data Sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be maintained on site for each chemical and related product to include sufficient information to determine usage rates and associated emissions. An electronic database may be used to store and report such information.
[Rule 62-213.440, F.A.C.; Construction Permit No. 0830137-003-AC]

A.7. Monthly Log. To demonstrate compliance with the VOC and HAP emissions limitations of this permit, the permittee shall keep a monthly log of the following information:

a. Identity and quantity each material used at the facility that contains a VOC or HAP.

b. Quantify the VOC and HAP emissions for the month and consecutive 12-month total.

c. Calculate and record the quantity of cabinets produced on Lines 1-3 and Line 4 separately.

d. Allocate the monthly VOC and HAP emissions between Lines 1-3 and Line 4 separately based on cabinet production. For example:

$$VOC_{1\text{-}3} = (VOC_{total}) \times (Cabinets_{1\text{-}3}) \div (Cabinets_{total});$$

$$HAP_{1\text{-}3} = (HAP_{total}) \times (Cabinets_{1\text{-}3}) \div (Cabinets_{total})$$

Cabinets finished on the Glaze Line and Offline Booths shall be attributed to the line that first began finishing the cabinet, either Lines 1-3 or Line 4.

It shall be assumed that all VOC/HAP in materials used are emitted to the atmosphere.

{*Permitting Note: "Cabinets" are tracked by the average cabinet size, which is typically a front plus a door approximately 30 inches by 30 inches. The top, sides, and insides are not typically finished.)*

e. Calculate and record the total VOC and HAP emissions for Lines 1-3 and Line 4 for the most recent consecutive 12-month period.

The monthly logs shall be completed within 10 working days of the following month.

[Rule 62-213.440, F.A.C.; Construction Permit No. 0830137-003-AC]

Other Requirements

A.8. Federal Rule Requirements. In addition to the specific conditions listed above, these emissions units are also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations, adopted and incorporated by reference in Rule 62-204.800(11), F.A.C. These requirements are shown in their entirety in Appendices NESHAP 40 CFR 63 Subpart A and NESHAP 40 CFR 63 Subpart JJ, which are a part of this permit.

40 CFR 63, Subpart JJ Applicable Provision References
(*Note: Entire section applies unless otherwise noted with specific applicable subsection references)*

§ 63.800	Applicability (a), (d), (f) and (g)
§ 63.801	Definitions
§ 63.802	Emission Limits (b)
§ 63.803	Work practice standards.
§ 63.804	Compliance procedures and monitoring requirements (d), (e)(1), (f) except (f)(4) and (f)(6), and (g) except (g)(4) and (g)(6)
§ 63.805	Performance test methods (a)
§ 63.806	Recordkeeping requirements All except (f) and (g)
§ 63.807	Reporting requirements All except (d)
§ 63.808	Implementation and enforcement

Table 1. General Provisions (NESHAP Subpart A) Applicability to Subpart J)

Table 2. List of Volatile Hazardous Air Pollutants

Table 3. Summary of Emissions Limits

Table 4. Pollutants Excluded from Use in cleaning and Washoff Solvents

Table 5. List of VHAP of Potential Concern Identified by Industry

Table 6. VHAP of Potential Concern

{*Permitting Note: This facility is considered a new affected source under 40 CFR 63, Subpart JJ. The above applicability references are based upon current operations as reflected in the Title V air operation permit renewal application received on June 1, 2011. Any change in operations may change the applicable provisions.*}

[Rule 62-204.800(11), F.A.C.; 40 CFR 63, Subpart JJ and Subpart A]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
004	Existing Emergency Fire Pump

The Perkins Model 1791/2600 diesel fuel fired emergency fire pump has a rating of 140 HP at 2,350 rpm and was installed in 2000. The fire pump's diesel engine is subject to the requirements of 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE).

Permitting Note:

1. In order to be considered an emergency RICE subject to the 40 CFR 63 Subpart ZZZZ requirements for emergency CI RICE, the engine must be operated in accordance with the requirements specified in 40 CFR 63.6640(f).
2. The stationary CI RICE engine is exempt from the construction permit requirements of Rule 62-210.300(1), F.A.C., in accordance with the provisions of Rule 62-210.300(3)(a)35., F.A.C. (i.e., categorical and conditional exemption for stationary reciprocating internal combustion engines).
3. NSPS 40 CFR 60 Subpart IIII (Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines) does not apply to this engine based on their date of manufacture (i.e., before June 12, 2006).

Operation Requirements

B.1. Operating Hours - There are no specific limitations on operating hours for the fire pump. *(Also see Permitting Note No. 1 above)*
[Rules 62-4.160(2), and 62-210.200 (Definitions – Potential to Emit), F.A.C.]

Applicable Federal Requirements

B.2. 40 CFR 63 Subparts A and ZZZZ Requirements. This emissions unit is subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). These requirements are shown in their entirety in Appendices NESHAP 40 CFR 63 Subpart A and NESHAP 40 CFR 63 Subpart ZZZZ, which are a part of this permit. The fire pump's diesel engine is subject to the requirements for existing RICE ≤ 500 HP located at a major source of hazardous air pollutants (HAP). The following is a summary of these requirements:

Emissions Limitations:
§ 63.6602 and Table 2c

Monitoring, Installation, Collection, Operation and Maintenance Requirements
§ 63.6625(e), (f), (h) and (i)

Continuous Compliance
§ 63.6605 and § 63.6640

Recordkeeping Requirements
§ 63.6655 except § 63.6655(c)

Reporting Requirements
Footnote 1 of Table 2c

General Provisions
Yes, except per § 63.6645(a)(5), the following do not apply: § 63.7(b) and (c), § 63.8(e), (f)(4) and (f)(6), and § 63.9(b)-(e), (g) and (h).

{Compliance Date Note – The final compliance date for the applicable Subpart ZZZZ requirements for this engine is May 3, 2013. The above applicability summary is based upon current operations as reflected in the Title V air operation permit renewal application received on June 1, 2011. Any change in operations may change the applicable provisions.}

[Rule 62-213.440, F.A.C.; NESHAP 40 CFR 63 Subparts A and ZZZZ]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.

Appendix I, List of Insignificant Emissions Units and/or Activities.

Appendix NESHAP 40 CFR 63 Subpart A - General Provisions.

Appendix NESHAP 40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

Appendix NSPS 40 CFR 60, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Appendix RR, Facility-wide Reporting Requirements.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis
Table H, Permit History.