Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Marshfield DoorSystems, Inc.
1401 East Fourth Street
Marshfield, WI 54449

Authorized Representative:
Ms. Jo Anne Firestone, V.P. - Administration

Air Permit No. 1030510-004-AF
Permit Expires: 05/05/2016
Site Name : Bolection Door – Largo Facility
Federally Enforceable State Operating Permit (FESOP)
Project Name: Operation Permit Renewal

This is the final air operation permit, which authorizes continued operation of a fiberboard door manufacturing facility. The work is conducted at the Bolection Door - Largo Facility (Standard Industrial Classification No. 2499). The facility is located in Pinellas County at 11200 69th Street North in Largo, Florida. The UTM coordinates are Zone 17, 329.25 km East, and 3084.57 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 and Facility-wide Specific Conditions

Section 3. 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.

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

_____ _____

Pamala Vazquez
Program Administrator
Southwest District

Effective Date

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 _____ to the persons listed below.

Ms. Jo Anne Firestone, Marshfield DoorSystems, Inc. (joanne.firestone@mdrsys.com)

Mr. Aaron K. Dahlby, Marshfield DoorSystems, Inc. (aaron.dahlby@mdrsys.com)

Mr. Gary Robbins, PCAQD (grobbins@co.pinellas.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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This fiberboard door manufacturing facility consists of an automated conveyorized production line and a manual production line. The two lines can operate simultaneously to produce 850 doors per day. The existing facility consists of the following emissions units:

Facility ID No. 1030510	
EU ID No.	Emission Unit Description
001	Automated Conveyorized Production Line
002	Manual Production Line

Project Description and Affected Emission Units

This permit renews Federally Enforceable State Operating Permit (FESOP) 1030510-002-AF. This permit also removes the specific condition that limits the finishing process to the use of acrylic water based primer only. Painting operations at this facility will qualify for a categorical exemption under Rule 62-210.300(3)(a).27., F.A.C. This change affects both emissions units listed above.

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

Exempt Emission Units/Activities

- One electric drying oven [Rule 62-210.300(b)1., F.A.C.]
- Painting operations: there are two paint spray booths, one booth for each production line [Rule 62-210.300(3)(a)27., F.A.C. - Categorical and Conditional Exemption for surface coating operations within a single facility]

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- 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 pollutant PM_{10}.

PERMIT HISTORY/AFFECTED PERMITS

Modifies Construction Permit 1030510-001-AC
Replaces FESOP 1030510-002-AF

ADMINISTRATIVE REQUIREMENTS

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

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division (PCAQD). The mailing address and phone number of the Local Air Program is:

   Pinellas County Air Quality Division
   300 South Garden Avenue
   Clearwater, Florida 33756
   Telephone: 727-464-4422

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. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to PCAQD (Compliance Authority) no later than 60 days prior to the expiration date of this operation permit. To properly apply for an 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.8., if not previously submitted;

   d. copies of the most recent month of logs specified in Specific Condition No. A.9.; and

   e. any proposed revisions to the most recently approved O & M Plan, if applicable.

   [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.]

FACILITY-WIDE SPECIFIC CONDITIONS

9. General Pollutant Emission Limiting Standards - Objectionable Odor: 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 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 62-296.320(2) and 62-210.200 (Definitions), F.A.C.; Pinellas County Code, Section 58-178]

10. Reasonable Precautions for Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. At a minimum, the following precautions shall be taken by the permittee:

    a. Use of water when necessary to control fugitive emissions, such as the use of water to keep roadways and work areas damp to control dust and airborne emissions.

    b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.

c. Landscaping or planting of vegetation.

d. Exercise good housekeeping practices at all times.

e. Attend to upset conditions promptly.

f. Make applicable personnel aware of the environmental requirements in the permit.

[Rules 62-296.320(4)(c)1. and 3., F.A.C.; Construction Permit 1030510-001-AC]

*{**Permitting Note:** If operating experience indicates that these reasonable precautions are not sufficient to control unconfined emissions, the Department or PCAQD reserve the right to require additional measures.}*

11. Fugitive Emissions Opacity Standard. In order to provide reasonable assurance that the precautions and practices taken at the facility are adequate, visible emissions from all sources of unconfined particulate matter at the facility's property line should not exceed 5% opacity. Exceedance of this limit shall not be considered a violation in and of itself, but may be a violation of the precautions specified in Specific Condition No. 10.
[Rule 62-4.070(3), F.A.C.]

A. EU No. 001 – Automated Conveyorized Line and EU No. 002 – Manual Production Line

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001 and 002	The fiberboard door manufacturing operation consists of an automated conveyorized production line and a manual production line. The two lines can operate simultaneously to produce 850 doors per day. Particulate emissions from both lines are vented to a Donaldson Filtration Solutions Torit DF04-1444 cartridge dust collector that is divided into two sections, one for each line. Each section has its own exhaust stack. Material collected in both sections of the dust collector is transported via a screw conveyor system to a waste collection bin that is located in an enclosed building. Collected material is disposed of in a landfill. **Automated Conveyorized Line (EU No. 001)** This line consists of a cutting area with 2 panel circular saws, a wood waste chipper, assorted conveyor and vacuum lifts; a machinery area with 4 routers, 2 hinge block inserting machines, a double sided tenor, assorted conveyors and door flippers; and a priming area with a belt sander, 2 profile sanders, a panel cleaning machine, an automated enclosed spray machine, a electric drying oven, assorted conveyors and vacuum lift. The saws, planers, routers, sanders and wood waste grinder are vented to the west side of the dust collector rated at 60,000 CFM with a 250 HP fan, 112 filters. **Manual Production Line (EU No. 002)** This line consists of six production areas: cutting area, fabrication area, machinery area, prep area, assembly area and pre-hang area. This production line has a conventional manual woodworking machines consisting of table saws, routers, sanders, planers, shapers, etc., which are all vented to the east side of the dust collector rated at 17,000 CFM with a 60 HP fan, 32 filters.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum production rate for the fiberboard door manufacturing operation shall not exceed 850 doors per day.
{Permitting note: See Appendix D, Condition 1, for Operation Rate during Testing requirements.}
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030510-001-AC]

A.2. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rule 62-210.200(PTE), F.A.C.; Construction Permit 1030510-001-AC]

EMISSIONS STANDARDS

A.3. Visible Emissions: Visible emissions from each section of the dust collector system shall not exceed 20% opacity, however, in order to provide reasonable assurance that each section is being properly operated, visible emissions from each section should not exceed 5% opacity. Exceedance of the 5% limit shall not be considered a violation in and of itself, but an indication that the dust collector is not functioning properly.
[Rule 62-296.320(4)(b)1., F.A.C.; Construction Permit 1030510-001-AC]

TESTING REQUIREMENTS

A.4. Visible Emissions Tests: During each federal fiscal year (October 1st to September 30th), each section of the dust collector shall be tested to demonstrate compliance with Specific Condition No. A.3. All sources controlled by each section of the dust collector shall be in operation during testing.
{*Permitting Note: See Appendix D, Condition 1, for Operation Rate during Testing requirements*}
[Rule 62-297.310, F.A.C.; Construction Permit 1030510-001-AC]

A.5. Test Requirements: 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.6. Test Method(s): Required tests shall be performed in accordance with the following reference method.

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

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.7. 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.]

RECORDS AND REPORTS

A.8. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The actual production rate (in number of doors per hour) for the test period shall be included in the test report for each test. Failure to submit the actual production rate for the test period and a copy of the daily log for the test day with the test report may invalidate the test and fail to provide reasonable assurance of compliance.
[Rule 62-297.310(8), F.A.C.; Construction Permit 1030510-001-AC]

A.9. Daily Log: In order to demonstrate compliance with Specific Condition No. A.1., the permittee shall maintain appropriate daily records of the production lines. A daily operation log shall at a minimum contain the following:

a. Date, Facility Name, and Emission Unit ID Nos.;

b. Total number of doors processed through automated conveyorized line;

c. Total number of doors processed through manual production line; and

d. Total number of doors processed through both production lines.

Daily records shall be completed within 3 business days. These records shall be maintained at the facility for a minimum of the most recent three (3) year period and made available to the Permitting and Compliance Authorities upon request.

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

A.10. Operation and Maintenance (O & M) Plan for Particulate Matter Control: The permittee shall maintain and implement an O & M Plan for the dust collector to include a schedule for the maintenance and inspection of the control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of the control device and auxiliary equipment shall be retained at the facility for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The O&M Plan may be amended with the prior approval of the Compliance Authority. At a minimum, the O&M Plan shall include:

a. The operating parameters of the pollution control device.

b. Timetable for the routine maintenance of the pollution control device as specified by the manufacturer.

c. Timetable for routine periodic observations of the pollution control device sufficient to ensure proper operations.

d. A list of the type and quantity of the required spare parts for the pollution control device, which are stored on the premises of the permit applicant.

e. A record log which will indicate, at a minimum:

1. When maintenance and observations were performed;

2. What maintenance and observations were performed;

3. Who performed said maintenance and observations; and

4. Acceptable parameter ranges for each operational check.

[Rule 62-4.070(3), F.A.C. and Pinellas County Code, Section 58-128(a)]