



APPLICANT

Busby Cabinets
13313 Southern Precast Drive
Alachua, Florida 32615

PROJECT

Initial Air Construction Permit
Draft Permit No. 0010120-003-AC
Facility ID No.: 0010120
Alachua County

PERMITTING AND COMPLIANCE AUTHORITY:

Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: (904) 807-3300
Fax: (904) 448-4363



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

Busby Cabinets
13313 Southern Precast Drive
Alachua, Florida 32615

I.D. Number: 0010120
Permit/Cert Number: 0010120-003-AC
Date of Issue: **Draft**
Expiration Date:
County: Alachua
Latitude/Longitude: 29°46'34"N; 82°26'34"W
UTM: E-(17) 360.5; N-3294.8
Project: Initial Air Construction Permit

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-272, 62-296, 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

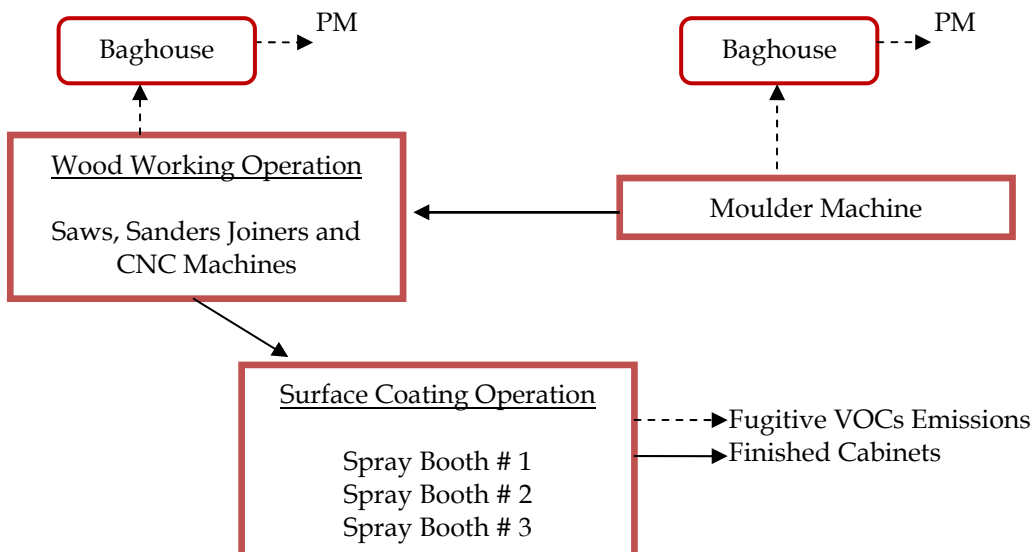
PROJECT

For the construction (after the fact) of a cabinet manufacturing facility.

FACILITY INFORMATION.

The facility is a cabinet manufacturing plant which makes cabinetry for residential use. The facility consists of woodworking and surface coating operation.

Process Flow Diagram



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Wood Working Operation. Various wood pieces are cut, sanded, routed and shaped as needed per order. The parts are then put together into cabinets with glues, nails, staples or screws. At each machine that generates sawdust, there are pickup hoods to vent the dust to the baghouse.

The baghouse is a Nordfab Systems unit model # NFK-2000 HJLR. There are 4 modules with 50 bag filters/module and one downward exhaust duct per module. The filters are cleaned by reverse air mechanism or when the control unit is shutdown. The fan is powered by a 60 horse power motor.

Moulder. The facility also consist of a moulder machine that is equipped with a baghouse (NBM dust collector).

Surface Coating Operation. The facility consists of 3 spray booths in addition to various tables for painting and staining. The spray guns used are typically airless, however on occasion air spray guns are used. The numbers and types of spray guns are described as below.

<u>Equipment</u>	<u>Quantity</u>
Kremlin MVX 60 Airmix	4
Kremlin M21VLP	2
Astro Star Siphon Feed Cup Gun	10

The information for the paint booths is as below.

Booth # 1 is a Brink booth with no inlet air heater. It is typically used for top coating the pieces.

Booth # 2 is a Black Crowe booth with 800,000 BTU/hour liquefied propane (LP) gas inlet air heater. It is typically used for sealer coating (strains).

Booth # 3 is a Black Crowe booth with 800,000 BTU/hour LP gas air heater. It is typically used for painting.

FACILITY REGULATORY CLASSIFICATIONS

The facility is a synthetic minor source of VOCs and HAP emissions.

The permitted emissions units are as defined below.

<u>E.U. ID No.</u>	<u>Emissions Point Description</u>
001 - Wood Working and Moulding Operation	001 - Wood Working Baghouse Emissions Point (Nordfab Systems)
	002 - Moulder Machine Baghouse Emissions Point (NBM dust collector)
002 - Surface Coating Operation	N/A

OPERATING LOCATION

Located at 13313 Southern Precast Drive, Alachua, Florida 32615.

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PERMIT CONTENT

<u>Section</u>	<u>Description</u>
Section A	Facility Wide Conditions
Section B	Unit specific conditions for Emissions Unit 001
Section C	Unit specific conditions for Emissions Unit 002
Section D	General Condition of Rule 62-4.160, Florida Administrative Code (F.A.C.)

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application for Air Permit - Non-Title V Source received June 5, 2008.
Request for Additional Information letter dated July 1, 2008.
Additional Information received August 8, 2008.

SECTION A. Facility Wide Common Conditions.

- A.1. The I.D. No. and Project name for this source shall be used on all correspondence.
- A.2. General Visible Emissions Standard: Except for emissions unit that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharge into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on Ringelmann Chart (20% opacity). Compliance shall be determined by EPA Method 9 upon Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C.
[Rule 62-296.320(4)(b) 1., F.A.C.]
- A.3. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:
(a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
(b) An emergency exists which requires immediate action to protect human health and safety.
[Rule 62-296.320(3), F.A.C.]
- A.4. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. Objectionable odor, is an odor present in the outdoor atmosphere which by itself or by combination with other odors, is or maybe harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which create a nuisance.
[Rule 62-296.320(2) and 62-210.200 (181), F.A.C.]
- A.5. Volatile Organic Compounds Emissions or Organic Solvents Emissions. No person shall 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.
[Rule 62-296.320(1), F.A.C.]
- A.6. 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 material; construction, alteration, demolition or wrecking; or industrially activity such as loading, unloading, storing and handling; without taking reasonable precaution to prevent such emissions. Reasonable precautions may include but are not limited to the followings:
a. Paving and maintenance of roads, parking areas and yards.
b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d. Removal of particulate matter from paved roads and/or other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters and similar equipment to contain, capture and prevent particulate matter.
g. Enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c), F.A.C.]

SECTION A. Facility Wide Common Conditions.

GENERAL NOTIFICATION REQUIREMENTS

- A.7. Malfunction Notification. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the NED Air Program immediately in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]
- A.8. Plant Operation – Problems: If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.
[Rule 62-4.130, F.A.C.]

ADMINISTRATIVE

- A.9. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
- A.10. Modifications. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rule 62-210.300(1), F.A.C.]
- A.11. 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(1), F.A.C.]
- A.12. General Conditions. The owner or operator is subject to and shall operate under the General Permit Conditions as described in Section D of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes.
[Rule 62-4.160, F.A.C.]
- A.13. All reports, tests, notifications or other submittals required by this permit shall be submitted to the:

Department of Environmental Protection
Northeast District – Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256
Telephone: 904/807-3300
Fax: 904/448-4366

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SECTION A. Facility Wide Common Conditions.

- A.14.** A completed **Application for Air Permit –Non-Title V Source** (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.
[Rules 62-4.055 and 62-4.220, F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Draft

Christopher L. Kirts, P. E.
District Air Program Administrator

Section B. Unit Specific Conditions for EU 001-Wood Working Operation with baghouses

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- B.1. Hours of Operation.** The hours of operation are limited to 4160 hours per 12 consecutive months. [Rules 62-4.160(2), 62-210.200(PTE), F.A.C. and applicant's request]
- B.2. Control Unit.** The emissions from the wood working operations shall be controlled by the permitted baghouse (Nordfab Systems unit model # NFK-2000 HJLR). The emissions from the moulder machine shall be controlled by the permitted baghouse (NBM Modular Dust Collector).

The owner or operator shall operate the baghouse during normal operation (whenever the dust is generated from the wood working operation). If there is a malfunction on the control unit, the owner or operator shall shut the baghouse fan immediately to minimize excess emissions. [Rule 62-210.700(1) and 62-21.650, F.A.C.]

WORK PRACTICE STANDARDS

- B.3. Circumvention:** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
- B.4.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- B.5.** Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700(5), F.A.C.]

RECORDKEEPING

- B.6. Hours of Operation Recordkeeping.** The owner or operator shall record the daily hours of operation, sum the hours on the monthly basis, then compile the records into hours per 12 consecutive months. The record shall be kept on site for at least 3 years. [Rule 62-4.070 (2) and 62-4.160, F.A.C.]
- B.7. Baghouse Malfunction/Maintenance Record.** The owner or operator shall maintain the malfunction and maintenance records of the baghouses. The record shall be kept on site for at least 3 years, and shall include the following information but not limited to:
- Date and type of malfunctions occurred.
 - Duration of the malfunction and correction action taken.
 - Maintenance conducted on the baghouses.
- [Rule 62-4.070 (2), and 62-4.160, F.A.C.]

Section C. Unit specific conditions for Emissions Unit 002-Surface Coating Operation

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- C.1. Hours of Operation. The hours of operation are not restricted.
[Rules 62-4.160(2), and 62-210.200(PTE), F.A.C.]
- C.2. Material Usage Limitation. The owner or operator shall not use more than 7776 gallons of VOC containing material per 12 consecutive months.
[Rule 62-4.070 (2), 62-210.200(PTE), F.A.C. and applicant's request]

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

- C.3. Emissions Cap. The owner or operator shall NOT cause to discharge
- I. More than 20 tons of Volatile Organic Compounds (VOCs) for 12 consecutive months; and
 - II. More than 5 tons of any single Hazardous Air Pollutant (HAP) for 12 consecutive months; and
 - III. More than 10 tons of Total Hazardous Air Pollutants (HAPs) for 12 consecutive months.
- [Applicant's request Facility Wide Cap, 62-210.200(PTE), F.A.C.]

COMPLIANCE DEMONSTRATION

- C.4. Compliance Demonstration. The owner or operator shall maintain records that demonstrate the annual emissions do not exceed the emissions limiting standards as specified in specific condition C.3. The records shall be kept onsite for at least 3 years.
- C.5. Records. The records shall include the following information.
- (1) A certified product data sheet (or MSDS) for each finishing material, thinner, contact adhesive, and strippable spray booth coating; and
 - (2) The HAP content, of each HAP containing material; and
 - (3) The VOC content, of each VOC containing material; and
 - (4) VOC/HAP containing material monthly usage (purchase receipt shall be maintained to justify the usage data); and
 - (5) Monthly VOC, single HAP and total HAPs emissions (include calculations); and
 - (6) VOC, single HAP and total HAPs emissions for 12 consecutive months.
- [Rule 62-4.070 (2), F.A.C.]

SECTION D. GENERAL CONDITIONS [RULE 62-4.160]

- D.1.** The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- D.2.** This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- D.3.** As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- D.4.** This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- D.5.** This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- D.6.** The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- D.7.** The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

SECTION D. GENERAL CONDITIONS [RULE 62-4.160]

D.8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

D.9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

D.10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

D.11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

D.12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

D.13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

SECTION D. GENERAL CONDITIONS [RULE 62-4.160]

D.14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

D.15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.