FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
7777 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T.VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

WFP Inc.
4045 J. Louis Street
Green Cove Springs, Fl 32043

Air Permit Number: 0190065-005-AF
Renewal Date: November 9, 2012
Expiration Date: November 9, 2017

Authorized Representative:
Mr. Joe Aldrich, President

WFP Inc
Air Operating FESOP Renewal

PROJECT AND LOCATION

This is the final air operating FESOP renewal for the continued operation of the existing surface coating facility for WestSide Forest products, Inc.

The existing facility is located at 4045 J Lewis St., Green Cove Springs in Clay County, FL. The Standard Industrial Classification No. (5211), for Surface Coating Operation. The UTM coordinates are Zone 17, 436.34 km East; 3316.32 km N.

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

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 operation 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.). 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 Jacksonville, Florida

Khalid AlNahdy

Khalid AlNahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Notice and Final Permit) 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 November 9, 2012 to the persons listed below.

Mr. Joe Aldrich. VP WFP, Inc. jaldrich@wfpcedar.com
Mr. George Whitmere, Whitmere Environmental Services Inc. george@whitmerenv.com

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.

Shane Maghen November 9, 2012
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This project is for the renewal of operating permit No. 0190065-005-AF, for the surface coating operation (Standard Industrial Classification No. 5211).

For the operation of two (2) flow coating machines to coat wood planks, composite and or cement exterior siding for sale to residential builders and homeowners.

Boards are fed into either #1 Flow Coater or #2 Flow Coater where the top, bottom and sides are flooded with the desired coating material. Spray guns are not used. Hydraulic brushes are then used to reduce the coating to the desired thickness. Removed coating drains to the bottom where it is re-circulated and reused. The coated materials are manually placed into drying racks.

The facility has the design capacity to be able to coat materials at a rate of 4,000,000 ft^2/yr (12 month rolling total), which would produce approximately 107 tons/yr (12 month rolling total) of VOC emissions. Production at this rate would classify the facility as a Title V Source.

However, in Air Construction Permit No. 0190065-002 AC, the facility requested and obtained a facility-wide VOC emission cap of 48.73 tons/year (12 month rolling total), by restricting hours of operation to no more than 4000 hours/year. The establishment of the emissions cap classifies the facility as a synthetic non-Title V source There is no manufacturing, cutting or trimming on site.

The facility consists of the following emissions units

Facility ID No. 0190065	
ID No.	Emission Unit Description
001	Flow Coaters #1 and 2

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 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

1. Permitting & Compliance Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 7777 Baymeadows Way, W. Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and phone number of the District Office is: 7777 Baymeadows Way, W. Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is (904) 256-1700.

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. The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. A completed **Application for Non-Title V Air Permit Renewal** (DEP Form No. 62-210.900(4), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation 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, 62-4.090, and 62-4.220, F.A.C.]

EU 001 Flow Coating Machines 1 and 2

The following specific conditions apply to the Emissions Unit listed below:

EU No.	Emission Unit Description
001	Two (2) flow coating machines (#1 Flow Coater or #2 Flow Coater) to coat wood planks, composite and or cement exterior siding for sale to residential builders and homeowners.

PERFORMANCE RESTRICTIONS

1. **Restricted Operation:** The hours of operation shall not exceed 4000 hours (based on 12-month rolling average).

   [Rules 62-4.160(2), and 62-210.200(PTE), F.A.C., Air Construction Permit No. 0190065-002 AC, Applicant's Request dated 05/28/02]

2. **Maximum Production Rate:** The maximum production rate is 4,000,000 ft^2, based on 12-month rolling average.

   [Rules 62-4.160(2), and 62-210.200 (PTE).F.A.C.]

EMISSION LIMITATION AND PERFORMANCE STANDARDS

3. **Emission Cap:** The facility-wide permitted maximum allowable emission rate shall not exceed 48.73 Tons based on a 12- month rolling average for VOC's.

   [Air Construction Permit No. 0190056-002-AC]

4. **Volatile organic compounds emissions or organic solvents 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. Procedures to minimize VOC emissions shall include, but not limited to:

   a. Maintain tightly fitting cover, lids, etc. on all containers of materials containing VOC when they are not being handled, tapped, etc.
   b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc., of materials containing VOC so that it can be covered when not in use.
   c. All fittings, valves, lines, etc., shall be properly maintained.
   d. All VOC spills shall be attended to immediately and the materials properly disposed of, recycled, etc.

   [Rule 62-296.320(1), F.A.C.]

NOTIFICATIONS, RECORDKEEPING AND REPORTING REQUIREMENTS

5. Recordkeeping: Compliance shall be determined by recording the following data:

a. Amount of VOC / HAP containing materials used (lbs/month).
b. VOC and HAP emissions (lbs/month).
c. VOC / HAP Factor (% by weight).
d. Monthly production rate (ft^2)
e. Total cumulative production rate based on a 12-month rolling average.
e. Total cumulative VOC / HAP emissions (tons per 12- month rolling average).
f. Hours of operation per month.
g. Hours of operation base on a 12- month rolling average.

The data shall be recorded monthly and maintained at the facility. VOC and HAP emission shall be determined using the method in Specific Condition No. 8.

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

6. Record Retention Period. All records or reports required as a condition of this permit shall be retained by WFP, Inc. for a period of at least five (5) years.

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

7. Air Operating Report (AOR) Submittal. The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5) shall be completed each year and submitted to the Department by March 1 of the following year.

[Rule 62-210.370(3)F.A.C.]

8. AOR Emissions Computations. The emissions shall be computed using the following methods:

- A means of validating the content of the pollutant that is contained in all materials used in or at the emissions unit shall be demonstrated;
- Assumption that the emissions unit emits all of the pollutant that is contained in or created by any material;
- Where the vendor of a raw material which is used in or at the emissions unit publishes a range of pollutant content from such material, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate;
- In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

[Rules 62-210.370 (2)(c)(1)a.,b., 2., 3., F.A.C.]

9. This facility is subject to the attached Appendices:

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.