



Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

PERMITTEE

WFP, Inc.
166 Industrial Loop South
Orange Park, Florida 32073

Authorized Representative:
Mr. Joe Aldrich, President

Air Permit No. 0190083-002-AF
Federally Enforceable State Operation Permit

WFP, Inc.
Clay County, Florida

PROJECT

This is the final Federally Enforceable State Operation Permit, which authorizes the operation of WFP, Inc., which is a lumber surface coating facility (Standard Industrial Classification No. 5211- Lumber and other Building Materials Dealers). This project is the initial FESOP for the operation of the existing surface coating facility for WFP, Inc. The facility is located in Clay County at 166 Industrial Loop South in Orange Park, Florida. The UTM coordinates are Zone 17, 430.88 kilometers (km) East, and 3338.85 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Facility Wide Conditions); Section 4 (Emissions Unit Specific Conditions) and Section 5 (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.

Upon issuance of this final permit, any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

0190083-002-AF Effective Date: DATE, 20yy

Renewal Application Due Date: Exp. DATE - 60, 20zz

Expiration Date: Eff. DATE + 5 years, 20zz

EXECUTION AND CLERKING:

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT

Julie Hudson
Environmental Manager

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this permit and all copies were sent on the filing date below to the following listed persons:

Mr. Joe Aldrich, President, WFP, Inc.: jaldrich@wfpcedar.com

Mr. George Whitmer, Whitmer Environmental Services, Inc.: george@whitmerenv.com

Mr. Stephen Alexander, P.E., Whitmer Environmental Services, Inc.: STEVEAIR57@YAHOO.COM

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

Date

DRAFT

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

WFP, Inc., is an existing wood siding company that has been in Reynolds Industrial Park, Green Cove Springs, Florida, since March, 2002. At this location, the facility was permitted under AIRS ID No. 0190065. The facility relocated to a new location in Orange Park, Clay County Florida. The process, equipment and operations did not change with the relocation.

The facility is a surface coating operation that consists of two (2) flow coating machines (Olympic Model 8000 and a GBI Lumber machine) used to coat wood planks, composite and or cement exterior siding for sale to residential builders and homeowners.

Received wood planks, composite and or cement exterior siding are fed into either Coating Line #1 or Coating Line #2 where the top, bottom and sides are flooded with the desired coating material by either #1 or #2 Flow Coater, as applicable. 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 wood planks, composite and or cement exterior siding 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 ft²/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.

The facility has requested a facility-wide VOC emission cap of 49.0 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 existing facility consists of the following emissions unit (EU).

EU No.	Emission Unit Description
001	Flow Coaters #1 and #2

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>State Rule Citations</i>	
Rule 62-210.200, F.A.C., Definitions	001
Rule 62-210.300, F.A.C, Permits Required	001
Rule 62-210.370, F.A.C, Emissions Computation and Reporting	001
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	001
Rule 62-4160, F.A.C., Permit Conditions	001

FACILITY REGULATORY CLASSIFICATION

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **does not** operate units subject to the acid rain provisions of the Clean Air Act.
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 213, F.A.C. The facility **is** a synthetic Non-Title V major source of air pollution.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Permitting Program, of the Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office, Permitting Program. The Permitting Authority's telephone number is (904) 256-1700.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is (904) 256-1700.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and 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: 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. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
8. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

9. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) District Office. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

SECTION 3. FACILITY-WIDE CONDITIONS

1. VOC Emissions Cap. The total maximum allowable facility-wide VOC emissions from all operations shall not exceed 49.0 tons per any consecutive 12-month rolling period. This limitation is requested by the applicant.

[Air Construction Permit No. 0190083-001-AC, Title V Applicability Avoidance]

2. General Visible Emissions. Except for emissions units (and emissions points) that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions elsewhere in this permit, no person shall cause, let, permit, suffer, or allow to be discharged 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 the Ringelmann Chart (20% opacity). If a special compliance test is required, the test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rule 62-296.320(4)(b)1., F.A.C.]

3. 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.]

SECTION 4. EMISSIONS UNIT SPECIFIC CONDITIONS

Emissions Unit 001 – Flow Coaters #1 and #2

This section of the permit addresses the following emissions unit.

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.

{Permitting note(s): This emissions unit is subject to Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards.}

PERFORMANCE RESTRICTIONS

1. Permitted Capacity- Production: The maximum production rate shall not exceed 4,000,000 ft² total of wood planks, composite, and cement exterior siding, based on 12- month rolling average.
[Rule 62-210.200(PTE), F.A.C., Rule 62-4.160(2), F.A.C., Air Construction Permit No. 0190083-001-AC]
2. Permitted Capacity- Coating and Solvent Process Rate: The maximum process rate is estimated to be 36,491 gallons per year of coating and solvents.
[Rule 62-210.200(PTE), F.A.C., Rule 62-4.160(2), F.A.C., Air Construction Permit No. 0190083-001-AC]
3. 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 0190083-001-AC]

RECORDS AND REPORTS

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 (ft²)
 - 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 Rules 62-210.370(2)(c)1.a.,b., 2., 3., F.A.C.

[Rule 62-4.070(3), F.A.C., Rules 62-210.370 (2)(c)1.a., b., 2., 3., F.A.C]

6. Record Retention Period. All supporting information, documentation, and records used to compute emissions shall be maintained onsite at the facility in a permanent form suitable for Department inspection for at least five years from the date the data is recorded. This includes, but it not limited to performance test results, emission unit hours of operation, fuels combusted, quantity of fuels combusted, methods, calculations, and formulas. These records and materials shall be made available to the Department upon request.

[Rule 62-4.070(3), F.A.C., Rule 62-4.160(14)(b), F.A.C.]