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:
Real Wood Products Corporation
Post Office Box 620
Madison, FL 32056

I.D. Number:	0790021
Permit/Cert Number:	0790021-005-AC
Date of Issue:	February 26, 2007
Expiration Date:	March 10, 2010
County:	Madison
Latitude/Longitude:	30°27'01"N; 83°24'19"W
UTM:	E-(17)268.28; N-3371.21
Project:	Increase throughput/emissions.

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-204, 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

Project 005 is for the modification of throughput rates and an increase in emissions.

FACILITY DESCRIPTION

This facility fabricates wood products, which are used in the manufacturing of kitchen cabinets. VOC and PM emissions are generated from three emission sources: the wood processing room, wood parts bonding area, and the finishing room.

Wood sawing, grinding, planning, and sanding operations take place in the wood processing room. A cyclone collector and a baghouse dust collector are used to respectively control the heavy and the finer PM emissions collected by the ventilation system.

A dry filter (Paint Arrestor) is used to control the PM emissions generated by the finishing room operations.

Potential emissions at the facility are estimated to be as follows:

VOC	6.61
HAPs	2.62
PM	13.86

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Emission Units are identified as follows:

Emissions Unit 001: Paint Finishing Room
Emissions Unit 002: Wood Parts Bonding Area
Emissions Unit 003: Point 1: Cyclone for coarse wood dust collection
Point 2: Baghouse for fine wood dust collection

REGULATORY CLASSIFICATION

This facility is subject to regulation under Rule 62-296.320, F.A.C. for Unconfined Particulate Matter, Visible Emissions and VOC/Odor.

OPERATING LOCATION

Located at Route 4, Box 500, Harvey Green Drive, Madison, Madison County, Florida.

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 Construction Permit received November 22, 2006.

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GENERAL CONDITIONS:

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 the conditions.

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.

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.

4. This permit conveys not 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.

5. This permit does no 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 permitted to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

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.

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 record 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.

GENERAL CONDITIONS:

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 non-compliance, 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.

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.

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.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.

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

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)

GENERAL CONDITIONS:

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 measurement;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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.

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SPECIFIC CONDITIONS:

1. The I.D. No. and project name for this source shall be used on all correspondence.

2. **Hours of Operation**: The hours of operation shall not exceed 12 H/D, 6 D/W, 52 W/Y, 3744 H/Y. [Rule 62-4.160(2) and Rule 62-210.200(PTE), F.A.C.]

3. **Permitted Capacity:** The maximum board footage shall not exceed 390,000 board feet per year without prior Department approval. [62-210.200(PTE), F.A.C.]

EMISSIONS LIMITS AND PERFORMANCE STANDARDS

4. **Unconfined Particulate Matter Emissions – Baghouse/Cyclone:** Unconfined Particulate Matter Emissions from the wood cutting, sawing, and planning operations shall be captured by the exhaust hoods on the production floor and controlled by either the baghouse or the cyclone. [Rule 62-296.320(4)(c), F.A.C.]

5. **Visible Emissions – Cyclone:** Visible emissions from the cyclone exhaust shall not be equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

6. **Visible Emissions – Baghouse:** Visible emissions from the baghouse exhaust shall not exceed 5% opacity. [Rule 62-297.620(4), F.A.C., Rule 62-297.310(7)(c), F.A.C.]

7. **Unconfined Particulate Matter Emissions – Facility:** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, 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 shall include, but are not limited to the following:
   a. Access doors to the baghouse collector and cyclone collected shall never be opened during windy conditions.
   b. The dust hopper and container door shall be kept closed at all times.
   c. Water spray shall be applied to sawdust piles, as necessary, during windy conditions.

   [Rule 62-296.320(4)(c)1, and Rule 62-296.320(4)(c)2]

8. **Baghouse/Cyclone Operation:** The baghouse and the cyclone separator shall be in operation during all times the woodworking equipment is operating. [Rule 62-210.650, F.A.C.]

9. **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), F.A.C. and Rule 62-210.200(203), F.A.C.]

SPECIFIC CONDITIONS:

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

10. **Compliance Testing – Baghouse/Cyclone:** At each emissions source, test the emissions for the following pollutant within 45 days after startup, notify the Department within 15 days prior to testing and submit the report documentation to the Department within 45 days after completion of the testing.

Pollutant	Test Method	FAC Rule
VE	DEP Method 9	62-296.320(4)(b)4.a.

11. **Operation During Compliance Test:** Unless otherwise stated in the applicable limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. If it is impracticable to test at permitted capacity an emissions unit may be tested at less than the minimum permitted capacity; in this case; subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2)(b), F.A.C.]

12. **Compliance Test Procedures:** Test Procedures shall meet all applicable requirement s of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)4.b, F.A.C.]

13. **Requirement for Annual Testing:** The owner or operator shall meet all applicable requirements of Rule 62-297.310(7)(a) F.A.C. [Rule 62-297(7)(a) F.A.C.]

14. **Required Equipment:** The owner or operator of an emission unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
[Rule 62-297.310(5)(a), F.A.C.]

15. **Accuracy of Equipment:** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5)(b), F.A.C.]

SPECIFIC CONDITIONS:

EQUIPMENT REPAIRS

16. **Unconfined Particulate Matter Emissions – Equipment Repairs:** The permittee shall maintain and operate, as described below, the following.
    A. All fine wood dust produced by sanding machines shall be collected by free standing collectors of appropriate capacity that are installed adjacent to the sanding machines;
    B. All wood shavings and heavier particles produced by saws, shapers, planners, and molding machines shall be collected by the cyclone collector only;
    C. The cyclone collector shall be free from air leaks;
    D. Fine particulate matter from the top of the cyclone collector shall be collected and controlled;
    E. Collection trucks and trailers shall have canvas covers over the collected materials at any time materials are not being loaded or unloaded, especially while in transit;
    F. Enclosed trough conveyors shall be maintained to transport collected materials to trucks or trailers;
    G. The enclosure around the truck or trailer shall be maintained to control fugitive particulate matter emissions.

    [Proposed equipment repairs by Applicant dated 8-8-02]

REPORTING AND RECORDKEEPING

17. **Recordkeeping:** The owner or operator shall maintain complete file of the following information on a legible form. These records shall be retained for at least three years and made available for DEP inspection;

    Facility Wide-
    A. Maximum board footage processed;
    B. Hours of operation;

    VOC/HAP
    C. Total cumulative Hap and VOC emissions in tons per year;
    D. Quantity – gallons of materials used (plant usage logs shall be maintained);
    E. Emissions Factors – Density of material in pounds per gallon (manufacturers specification data shall be maintained);
    F. Pollutant Factor – percentage by weight.

    [Rule 62-4.070, F.A.C.]

18. **Reporting:** The owner or operator shall submit a 30- day report outlining the recordkeeping requirements of Specific Condition 17, no later than 30 days prior to expiration of this permit in order to demonstrate compliance with this condition.
    [Rule 62-4.070, F.A.C.]

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ADMINISTRATIVE

19. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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