



# Florida Department of Environmental Protection

Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## FINAL PERMITS

### PERMITTEE

Tropitone Furniture Co., Inc.  
5 Marconi  
Irvine, CA 92718

Authorized Representative:  
Mr. Randy Danielson, CFO

Air Permit Nos. 0810219-002-AC<sup>1</sup>  
0810219-003-AO<sup>2</sup>  
Permit Expires: 12/31/2009<sup>1</sup>  
08/27/2014<sup>2</sup>

Site Name: Main Building and Sunwest Facility  
Minor Air Construction and Operation Permit  
Project Name: Furniture Manufacturing Facility

These final air construction and operation permits (in one document) are issued for an existing furniture manufacturing facility that has been operating under an Air General Permit. The construction permit establishes higher emission limitations for volatile organic compounds (VOC) and hazardous air pollutants (HAPs) than those allowed by the air general permit. The air operation permit authorizes continued operation of the facility. The existing operation (Standard Industrial Classification No. 2514) is conducted in Manatee County at 1401 Commerce Boulevard and 6530 18<sup>th</sup> Street East in Sarasota, Florida. The UTM coordinates for the permitted location (Sunwest Facility) are Zone 17, 347.58km East, and 3034.32 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 document 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, these permits contain numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

These permits are 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. 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 these final permits, 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

Mara Grace Nasca August 26, 2009  
Mara Grace Nasca Effective Date  
District Air Program Administrator  
Southwest District

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, Final Permits 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 08/27/2009 to the persons listed below.

Randy Danielson, Tropitone Furniture Co., Inc. (randan@tropitone.com)  
Mickey Regan, GaiaTech (mregan@gaiatech.com)  
Henry Adamiak, P.E., Remediation Technologies, Ltd. (hadamiak@remediationtech.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.

Patricia Roberts 08/27/2009  
(Clerk) (Date)

**SECTION 1. GENERAL INFORMATION (FINAL)**

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**FACILITY AND PROJECT DESCRIPTION**

**Tropitone Furniture Co., Inc.**

Tropitone Furniture Co., Inc. manufactures indoor and outdoor furniture with powder coating processes of metal furniture and the manufacturing of tabletops from reinforced plastic composites. The existing facility consists of the following emissions units.

Facility ID No. 0810219	
<b>ID No.</b>	<b>Emission Unit Description</b>
001	Gelcoat and Resin Application

**Project Description**

Tropitone Furniture Co., Inc. manufactures casual indoor and outdoor patio furniture, pool furniture, contract and hospitality furnishings, and patio umbrellas. The facility is composed of two locations, (1) Main Building and (2) Sunwest Facility. The buildings are less than one mile apart. This permit authorizes activities at the Sunwest Facility only given that all activities at the Main Building are exempt by categorical and conditional exemptions.

At the Main Building, patio furniture is formed and assembled. Aluminum tubing, plexi-glass and vinyl strapping are the primary raw materials. The chair and table-bottom manufacturing and assembly process begins with bending, cutting, and drilling the aluminum tubing using both hydraulic and pneumatic machinery. The tubing is then welded into frames and assembled, followed by an acid bath and rinse containing sulfuric acid, ammonium bifluoride, nitric acid, fluoride compound, and hydroxylamine sulfate. The frames are then powder coated with paint prior to being heated in a bake oven. Some frames receive plastic slides; cushions, straps, and fabric are attached to chair frames.

At the Sunwest Facility, table-tops are manufactured by mixing a two-part polyurethane chemical in a silicone mold, which is initially lined with a gel coat then a resin. The principle operations at the site include: raw material receiving; mold cleaning using acetone; mold preparation using spray and hand-applied wax; gel coat application using an air-assisted atomized sprayer; resin application via an air-assisted atomized sprayer; "A/B fill" mixing and casting (poured into a mold); curing, cutting, sanding, and polishing of the cured tabletop; "patina" application using either an air-atomized sprayer or hand application using rags; air drying; hand application of sealer; bracket installation; and finally packaging the finished furniture product for transport to the Main Building or shipment directly to the customer.

**Exempt Emission Units/Activities**

All activities at Main Building:

- Mold Fabrication: fabrication of silicone molds using polysiloxane and hardener.
- Welding: welding and associated fumes.
- Washer: 3-stage furniture products washing process and associated emissions of reagents used in certain washes and natural gas combustion emissions. (1.0 MMBtu/hr)
- Dryer: drying of furniture products and associated natural gas combustion emissions. (1.5 MMBtu/hr)

## SECTION 1. GENERAL INFORMATION (FINAL)

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- Powder Coating Booth: powder coating of dried furniture products and associated particulate emissions.
- Curing Oven: curing of powder-coated furniture products and associated natural gas combustion emissions. ( 3.0 MMBtu/hr)
- Batch Curing Oven: curing of touch-up/small batch powder-coated furniture products and associated natural gas combustion emissions. (1.0 MMBtu/hr)
- Touch-Up Painting: application of aerosol touch-up paint to furniture products.
- Hand-Wipe Cleaning: cleaning of furniture products using denatured alcohol saturated rags.
- Spray Adhesive: adhesive used in sewing operations.

### Sunwest Building:

- Mold Preparation: mold surface prep by cleaning with acetone and spray and/or hand application of mold wax. Mold will be used to create various table-top products.
- A/B Fill Casting: mixing and pouring of 2-part polyurethane resin into the mold.
- Patina Application: atomized-spray and/or hand application of latex paint to surface of some table-top products.
- Clear Application: spray application of clear sealant with atomized spray gun to surface of table-top product.

[Rules 62-210.300(3)(a)13, 27, 33 and 62-210.300(3)(b), F.A.C.]

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

### **FACILITY REGULATORY CLASSIFICATION**

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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.
- This facility is a synthetic minor source of air pollutant(s): HAPs, Styrene (H163), and Volatile Organic Compounds (VOCs).

### **PERMIT HISTORY/AFFECTED PERMITS**

Replaces Permit No. 0810219-001-AG

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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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 to operate an emissions unit 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 Southwest District Office's Air Resource Management Section (see above mailing address and phone number).
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.
  - e. Appendix E. Unified Emission Factors for Open Molding of Composites
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.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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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 no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- 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/>*);
  - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
  - copies of the most recent two (2) months of records/logs specified in Specific Condition No. A.5.

[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.]

## SECTION 3. FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

### A. Gelcoat and Resin Application (EU No. 001)

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	Gelcoat and Resin Application

#### PERFORMANCE RESTRICTIONS

- A.1. Restricted Operation: The hours of operation of are not limited (8,760 hours per year).  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

- A.2. Styrene Emission Limitation: Emissions of styrene, an individual HAP, shall not exceed 9.49 tons per any consecutive 12-month period.  
[Rule 62-210.200(PTE), F.A.C.]
- A.3. Total VOCs Emission Limitation: Total emissions of VOCs (including styrene) shall not exceed 10.80 tons per any consecutive 12-month period.  
[Rule 62-210.200(PTE), F.A.C.]
- A.4. Total HAPs Emission Limitation: Total emissions of HAPs shall not exceed 10.80 tons per any consecutive 12-month period.  
[Rule 62-210.200(PTE), F.A.C.]

#### RECORDKEEPING REQUIREMENTS

- A.5. HAP and VOC Recordkeeping - The permittee shall keep monthly logs to document compliance with the styrene, Total VOC, and Total HAPs limitations in Specific Condition Nos. A.2., A.3., and A.4. Usage of materials may be based on inventory at the beginning of the month, receipt of material during the month, and inventory of the materials at the end of the month, provided that the materials are not used in multiple application methods with different emission factors. The monthly logs shall include, but not be limited to, the following information:
- facility name, facility ID No., emission unit ID No., and description (i.e., Tropitone Furniture Co., Inc., 0810219, E.U. 001, Gelcoat and Resin Application);
  - month, year, and method used for records (usage or inventory);
  - identify and quantify each resin, coating, solvent, etc. used at the facility that contains Styrene, MMA, and/or other HAPs and VOCs;
  - appropriate emission factor(s), and method(s) of application (e.g., mechanical atomized, gelcoat controlled spray application) used to determine styrene, MMA and/or other HAPs and VOC emissions;
  - monthly total of styrene emissions (tons/month);

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## SECTION 3. FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

### A. Gelcoat and Resin Application (EU No. 001)

- f. monthly total of VOC (including styrene) emissions (tons/month);
- g. monthly total of Total HAP emissions (tons/month);
- h. most recent 12 consecutive month period total of styrene emissions (tons/12 consecutive month period) based on (e.) above; and
- i. most recent 12 consecutive month period total of VOC (including styrene) emissions (tons/12 consecutive month period) based on (f.) above.
- j. most recent 12 consecutive month period total of Total HAP emissions (tons/12 consecutive month period) based on (g.) above.

*(Note: Emissions shall be determined and calculated based on material usage and species concentration. Additionally, styrene and MMA emissions shall be determined and calculated using the emission factors in the attached Appendix E (Composite Fabricators Association – Unified Emission Factors for Open Molding of Composites (July 23, 2001))).*

The monthly logs shall be completed by the end of the following month. These records shall be maintained at the facility for at least three (3) years and made available to the Department upon request. Supporting documentation such as styrene/VOC /HAP content, styrene/VOC/HAP emission factors used, MSDS sheets, purchase orders, "As Supplied" data sheets, etc. shall be kept for each product which includes sufficient information to determine emissions.

If any month results in styrene emissions being within 10% of the allowable emission limit in Specific Condition No. A.2., for the prior consecutive 12-month period, the monthly log required shall be kept **daily**. The option of using purchases as a proxy for usage is not allowed for this daily recordkeeping. The daily logs shall include a cumulative 12-month emission total to demonstrate compliance with the emission limitations. These logs shall be completed within three (3) business days.

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

- A.6. Initial Records Submittal - Within 120 days after the effective date of this permit, submit to the Air Compliance Section of the Department's Southwest District Office two (2) recent months of records as required by Specific Condition No. A.5.  
[Rule 62-4.070(3), F.A.C.]