



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Tropitone Furniture Co., Inc.
5 Marconi
Irvine, CA 92618

Authorized Representative:
Mr. Randy Danielson, CFO

Air Permit No. 0810219-005-AO
Permit Expires: 08/27/2014
Site Name : Sunwest Facility
Minor Air Operation Permit
Project Name: Operation Permit Revision

This is the final permit for the revision of Air Operation Permit No. 0810219-003-AO for a furniture manufacturing facility at the Sunwest Facility (Standard Industrial Classification No. 2514). The facility is located at two locations in Manatee County at 1125 and 1401 Commerce Blvd. in Sarasota, Florida. The UTM coordinates are Zone 17, 346.52 km East, and 3032.68 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to 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 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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this

proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of when and how the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M. Boatwright 12/14/2012
Kelley M. Boatwright 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 Permit 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 the date indicated below to the persons listed below.

Randy Danielson, CFO
Tropitone Furniture Co., Inc.
radan@tropitone.com

Chris Blume, VP of Air Quality/Technical Service
Gaia Tech
cblume@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.

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Tropitone Furniture Co., Inc. manufactures casual indoor and outdoor patio furniture, pool furniture, contract and hospitality furnishings, and patio umbrellas. They powder coat metal furniture and manufacture tabletops from reinforced plastic composites. The facility is composed of two locations, (1) Main Building and (2) Sunwest Facility. Activities at the Sunwest facility are regulated and all activities at the Main Building are currently exempt.

| | |
|-------------------------|-------------------------------|
| Facility ID No. 0810219 | |
| ID No. | Emission Unit Description |
| 001 | Gelcoat and Resin Application |

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

Exempt Emission Units/Activities

All activities at Main Building (1401 Commerce Blvd.):

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. Exempt activities include:

- Mold Fabrication: fabrication of silicone molds using polysiloxane and hardener.
- Welding: welding and associated fumes.
- Washer (1.0 MMBtu/hr): 3-stage furniture products washing process and associated emissions of reagents used in certain washes and natural gas combustion emissions.
- Dryer (1.5 MMBtu/hr): drying of furniture products and associated natural gas combustion emissions.
- Powder Coating Booth: powder coating of dried furniture products and associated particulate emissions.
- Curing Oven (3.0 MMBtu/hr): curing of powder-coated furniture products and associated natural gas combustion emissions.
- Batch Curing Oven (1.0 MMBtu/hr): curing of touch-up/small batch powder-coated furniture products and associated natural gas combustion emissions.
- 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.

SECTION 1. GENERAL INFORMATION (FINAL)

Exempt Activities at Sunwest Building (1125 Commerce Blvd):

- 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 – Brazing, Soldering, or Welding Equipment; 62-210.300(3)(a)27 – Surface Coating Operation; 62-210.300(3)(a)33 – Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity equal to or less than 10 million Btu per hour and 62-210.300(3)(b), F.A.C.]

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 62-213, 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 non-Title V source for the pollutants Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs). The emission limitations in this permit will ensure that the facility's VOC and HAP emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Incorporates the terms and conditions of Construction Permit No. 0810219-004-AC. Modifies and replaces Permit No. 0810219-003-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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 shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance and Enforcement Section - Attention: AIR. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section - Attention: AIR
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

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;
- d. Appendix D. Common Testing Requirements; and
- e. Appendix E. Unified Emission Factor for Open Molding 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.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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.]

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:

- a. 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/>*);
- b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
- c. copies of the most recent month of records/logs specified in Specific Condition No. A.3.

[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. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Gelcoat and Resin Application

This section of the permit addresses the following emissions unit.

| ID No. | Emission Unit Description |
|--------|---|
| 001 | 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 gelcoat then a resin. There are three spray booths (two OFB-1000-12 and one OFB-1000-20) with 95% removal efficiency filters where gelcoat and/or resin application or exempt sawing/buffing occurs. The principle operations at the site, including exempt activities, are: raw material receiving; mold cleaning using acetone; mold preparation using spray and hand-applied wax; gelcoat 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. |

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - The hours of operation of are not limited (8,760 hours per year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 0810219-004-AC]

EMISSIONS STANDARDS

A.2. Emission Limitations - The emissions from furniture manufacturing shall not exceed the following:

| Pollutant | Tons per any consecutive 12-month period |
|--|--|
| Total Volatile Organic Compounds (VOC) | 10.80 |
| Total Hazardous Air Pollutants (HAPs) | 10.80 |
| Styrene (Individual HAP) | 9.49 |

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 0810219-004-AC]

RECORDS AND REPORTS

A.3. 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 No. A.2. 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:

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 - Gelcoat and Resin Application

- a. facility name, facility ID No., emission unit ID No., and description (i.e., Tropitone Furniture Co., Inc., 0810219, EU 001, Gelcoat and Resin Application);
- b. month, year, and method used for records (usage or inventory);
- c. identity and quantity of each resin, coating, solvent, etc. used at the facility that contains styrene, MMA, and/or other HAP and VOC;
- d. 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 HAP and VOC emissions;
- e. monthly total of styrene emissions (tons/month);
- 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;
- i. most recent 12 consecutive month period total of VOC (including styrene) emissions (tons/12 consecutive month period) based on f. above; and
- 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 (i.e., over 8.54 tons), the monthly log for styrene emissions shall be kept daily. The option of using purchases as a proxy for usage is not allowed for this daily recordkeeping. The total daily values for the month shall then be added to the previous 11-month period total emissions for styrene. The daily recordkeeping shall remain in effect until the consecutive 12-month period total styrene emissions are below 8.54 tons. These logs shall be completed within three (3) business days.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 0810219-004-AC]