

Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

June 3, 2005

Mr. John Lewis, Acting Plant Manager  
Merillat Corporation, LLC  
1300 S.W. 38<sup>th</sup> Avenue  
Ocala, FL 34474

Re: Air Construction Permit No. 0830137-003-AC  
Merillat Ocala Plant  
Addition of 4<sup>th</sup> Line

Dear Mr. Lewis:

The Department has reviewed your application requesting authorization to add a 4<sup>th</sup> finishing line at the existing wood furniture finishing plant, which is located in Marion County at 1300 S.W. 38<sup>th</sup> Avenue, Ocala, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

*"More Protection, Less Process"*

*Printed on recycled paper.*

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

Merillat Corporation, LLC  
1300 S.W. 38<sup>th</sup> Avenue  
Ocala, FL 34474

Draft Air Permit No. 0830137-003-AC  
Ocala Plant - Addition of 4<sup>th</sup> Line  
Marion County, Florida

### PROJECT DESCRIPTION

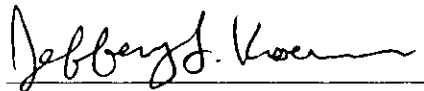
The existing facility includes woodworking and finishing operations for the manufacturing of bath and kitchen cabinets. The cabinet components are constructed in the woodworking areas then moved, via hanging chain conveyor systems, through three finishing lines. There are three identical existing lines (Lines 1-3) used to finish cabinets. Each line is used to apply toners, stains, sealers, and topcoats resulting in emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). VOC and HAP emissions generated from the surface coating operations are captured and vented to the atmosphere using a system of hoods, ductwork, fans, and stacks. The components are then assembled, packaged, and loaded for immediate shipping.

The wood furniture finishing operations are subject to the National Emissions Standards for Hazardous Air Pollutants in Subpart JJ of 40 CFR 63, which is adopted by reference in Rule 62-204.800, F.A.C. Emissions control is based on reduced solvent coatings. Emissions averaging is used to demonstrate compliance by calculating the average volatile organic HAP coating concentrations for the range of products used over a month of operation. The current permit also limits VOC/HAP emissions to no more than 249 tons per year. Actual VOC emissions from the plant are approaching 200 tons per year.

The applicant proposes to add a 4<sup>th</sup> finishing line consisting of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. The new line is also subject to the requirements in Subpart JJ of 40 CFR 63. Allowable VOC/HAP emissions will be limited to 166 tons during any consecutive months.

The existing plant is a PSD-minor facility based on the VOC limit of 249 tons per year for the installed equipment (Lines 1-3). The applicant does not request a relaxation of this limit. The new project (Line 4) will have allowable VOC emissions of 166 tons per year, which is not a major modification by itself. The new project is considered to be separate and distinct from the original project and is not a phased project. Therefore, the project does not trigger PSD preconstruction review. The draft permit includes record keeping and reporting requirements to ensure compliance with the two separate VOC limits.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration Number: 49441

6-2-05

(Date)

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an  
Application for Air Permit by:*

Merillat Corporation, LLC  
1300 S.W. 38<sup>th</sup> Avenue  
Ocala, FL 34474

*Authorized Representative:*

Mr. John Lewis, Acting Plant Manager

Air Permit No. 0830137-003-AC  
Facility ID No. 0830137  
Merillat Ocala Plant  
Addition of 4<sup>th</sup> Line  
Marion County, Ocala, Florida

**Facility Location:** Merillat Corporation, LLC operates an existing wood furniture manufacturing plant located in Marion County at 1300 S.W. 38<sup>th</sup> Avenue, Ocala, Florida.

**Project:** The applicant proposes to add a 4<sup>th</sup> finishing line consisting of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. Operators will manually apply coatings such as stains, glazes, toners, sealers, and topcoats to wood components. Application of the coatings will result in emissions of volatile organic compounds. Emissions will be controlled by the use of reduced solvent coatings in accordance with federal requirements regulating this industry. The finished materials will be assembled into kitchen and bath cabinets. Details of the project are provided in the in the application and the enclosed "Technical Evaluation and Preliminary Determination".

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. A copy of the complete project file is also available at the Air Resource Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. The telephone number is 407/894-7555.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

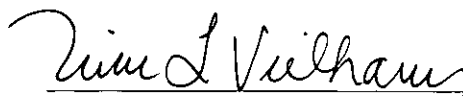
**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) 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, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (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 how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

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

**Mediation:** Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 6/6/05 to the persons listed below.

- Mr. John Lewis, Merillat Ocala Plant\*
- Ms. Donna Tackett, Merillat Ocala Plant
- Mr. Jim O. Merillat Corporate Headquarters
- Mr. Joel Cohn, Malcolm Pirnie, Inc.
- Mr. David Cibik, Malcolm Pirnie, Inc.
- Mr. Len Kozlov, CD

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.

Mary B. Stanny  
(Clerk)

6/6/05  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Draft Air Permit No. 0830137-003-AC  
Merillat Corporation, LLC – Ocala Plant  
Marion County, Florida

**Applicant:** The applicant for this project is the Merillat Corporation, LLC. The applicant's authorized representative is Mr. John Lewis, Acting Plant Manager. The mailing address is Merillat Corporation, LLC, 1300 S.W. 38<sup>th</sup> Avenue, Ocala, FL 34474.

**Facility Location:** Merillat Corporation, LLC operates an existing wood furniture manufacturing plant located in Marion County at 1300 S.W. 38<sup>th</sup> Avenue, Ocala, Florida.

**Project:** The applicant proposes to add a 4<sup>th</sup> finishing line consisting of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. Operators will manually apply coatings such as stains, glazes, toners, sealers, and topcoats to wood components. Application of the coatings will result in emissions of volatile organic compounds. Emissions will be controlled by the use of reduced solvent coatings in accordance with federal requirements regulating this industry. The finished materials will be assembled into kitchen and bath cabinets.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. A copy of the complete project file is also available at the Air Resources Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. The telephone number is 407/894-7555.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the

(Public Notice to be Published in the Newspaper)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Permitting Authority for notice of agency action may file a petition within fourteen (14) 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, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (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 rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (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; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

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

**Mediation:** Mediation is not available for this proceeding.

**(Public Notice to be Published in the Newspaper)**

**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

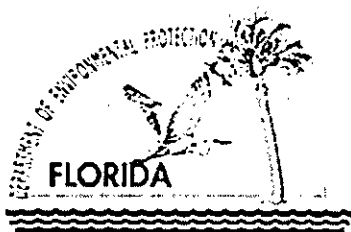
Merillat Ocala Plant  
Addition of 4<sup>th</sup> Finishing Line  
Project No. 0830137-003-AC

**APPLICANT**

ARMS Facility ID No. 0830137  
Merillat Corporation, LLC  
1300 S.W. 38th Avenue  
Ocala, Florida 34474  
Marion County

**PERMITTING  
AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
Air Permitting South Program



June 2, 2005

{Filename: TEPD - Merillat - 0830137-003-AC}

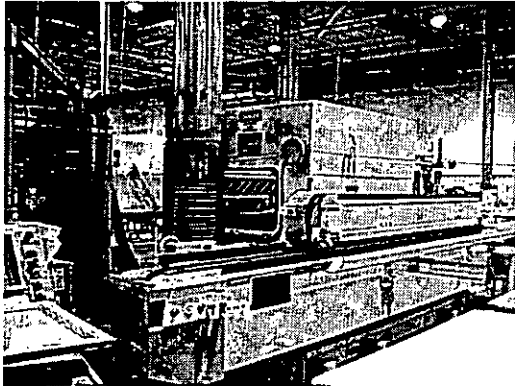


1. GENERAL PROJECT INFORMATION

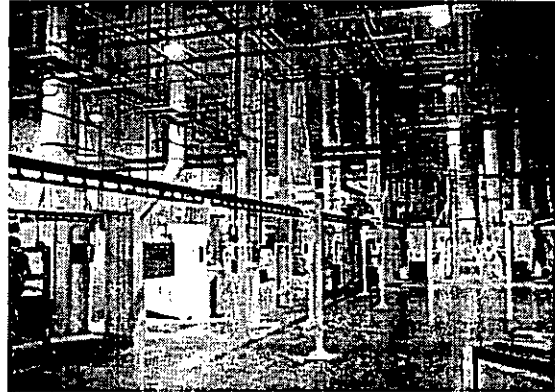
Facility Information

The Merillat Corporation operates an existing bath and kitchen cabinet manufacturing plant (SIC No. 2434) in Marion County located at 1300 SW 38<sup>th</sup> Avenue in Ocala, Florida. The UTM coordinates of the site are Zone 17, 384.5 km East and 3227.8 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

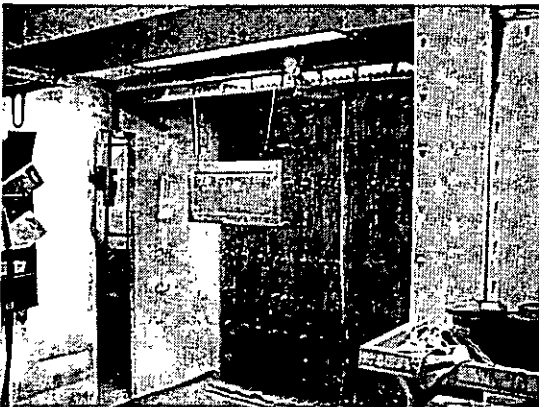
The existing facility includes woodworking and finishing operations for the manufacturing of bath and kitchen cabinets. The cabinet components are constructed in the woodworking areas then moved, via hanging chain conveyor systems, through three finishing lines. The components are then assembled, packaged, and loaded for immediate shipping. See photos below.



Wood Sander with PM Capture



Hanging Chain Finishing Conveyor Line



Spray Booth



Packing and Shipping Area

The woodworking area receives raw wood materials that are cut to size, planed, routed, sanded and assembled into the cabinet components prior to coating. Particulate emissions from the woodworking areas are captured via a dust collection system including hoods, ductwork, and fans. Fabric filters with a removal efficiency of at least 99% are used to control particulate emissions before venting to the atmosphere or inside the building. Controlled particulate emissions from the facility are estimate to be 1.2 tons per year.

Coatings are manually applied by operators in spray booths using high-volume low-pressure (HVLV) spray equipment. NESHAP Subpart JJ also allows equivalent equipment such as air-assisted or airless spray equipment. Spray booths consist of three walls, a roof, and one open side for operator entry. Wood components are transferred between process areas by an overhead hanging conveyor system. A small rectangular opening in each end wall of each spray booth allows parts to enter and exit the booth on the conveyor line. Roof-mounted

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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electric fans exhaust air from the process areas through roof stacks. Other areas along the conveyor line include hand operations such as stain wiping and sanding.

There are three identical existing lines (Lines 1-3) used to finish cabinets. Each line is used to apply toners, stains, sealers, and topcoats resulting in emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). VOC and HAP emissions generated from the surface coating operations are captured and vented to the atmosphere using a system of hoods, ductwork, fans, and stacks. Each existing finishing line consists of the following process areas and equipment:

- A pair of back-to-back spray booths for each application of toners, stains, sealers and topcoats (8 spray booths per line; one 7625 acfm exhaust fan per spray booth);
- A flash-off area following each pair of sealer and topcoat spray booths (2 flash-off areas per line; two 3000 acfm exhaust fans per flash-off area);
- A gas-fired curing oven following each pair of toner, stain, sealer, and topcoat spray booths (4 ovens per line; one 1000 acfm exhaust fan per toner oven; two 2000 acfm exhaust fans per stain, sealer, or topcoat oven); and
- A cool-down area following each sealer and topcoat oven (2 cool-down areas per line; one 6000 acfm exhaust fan per cool-down area).
- A conveyor line designed for a maximum speed of approximately 16 feet per minute.

In addition to the three existing finishing lines, there are off-line areas consisting of the following equipment:

- A stain wipe area (two 9000 acfm exhaust fans);
- A glaze area consisting of a spray booth, flash area and curing oven (two 2000 acfm exhaust fans per spray booth, one 2000 acfm exhaust fan per flash area or curing oven, and one 3000 acfm exhaust fan per glaze wipe area.); and
- An off-line accessory spray booth and curing oven to finish specialty components (one 10,500 acfm exhaust fan and one 1000 acfm exhaust fan).

The existing plant presently produces approximately 2,400 to 2,500 cabinets per day. The original plans indicated a maximum production rate of 2600 cabinets per day. The permit limits emissions of volatile organic compounds (VOC) and hazardous organic air pollutants (HAP) to no more than 249 tons per year. The finishing operations currently limit maximum production at the plant. The use of available lower solvent coatings would allow more production from the three existing lines without necessarily increasing emissions. The woodworking operations are sufficient to support much higher cabinet production.

The Merillat Ocala Plant was designed based on "lean production" methods. Orders are entered into a computerized database to schedule and stage the cabinet production operations including raw materials, woodworking, finishing, component assembly, and shipping. Lean production techniques result in less space needed for storing raw materials and finished products as well as overstock items. It also means that the plant can be more responsive to individual orders and special requests. Finishing can be completed and ready for shipment in approximately 6 hours. Orders are typically shipped within 5 days of being entered into the system.

### Processing Schedule

10/12/04 Application received.  
11/08/04 Department requested additional information.  
01/24/05 Department received additional information.  
02/22/05 Department requested additional information.  
04/19/05 Department received additional information; application complete.

### Regulatory Categories

The facility is subject to the following regulatory categories.

*Title III:* The facility is a major source of hazardous air pollutants (HAP).

*Title IV:* The facility operates no units subject to the acid rain provisions of the Clean Air Act.

*Title V:* The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

*PSD:* Prior to this project, the existing facility was considered a PSD-minor facility in accordance with Rule 62-212.400, F.A.C. Upon issuance of this permit, the facility is now classified as a PSD-major source of air pollution. Future projects must be reviewed for PSD applicability in accordance with the significant emissions rates specified in Rule 62-212.400, F.A.C.

*NESHAP:* The wood furniture finishing operations are subject to the National Emissions Standards for Hazardous Air Pollutants in Subpart JJ of 40 CFR 63, which is adopted by reference in Rule 62-204.800, F.A.C. Emissions averaging is used to demonstrate compliance by calculating the average volatile organic HAP coating concentrations for the range of products used over a month of operation.

### Project Description

Due to an increase in market demand, the applicant requests authorization to install a fourth finishing line consisting of the following process areas and equipment.

- A pair of back-to-back spray booths for the application of sap primer, toners, stains, sealers and topcoats (10 total booths);
- A flash-off area following each pair of sealer and topcoat spray booths;
- A gas-fired curing oven following each pair of sap primer, toner, stain, sealer, and topcoat spray booths (5 ovens per line);
- A cool-down area following each sealer and topcoat oven (2 cool-down areas per line); and
- A conveyor line designed for a maximum speed of approximately 30 feet per minute.

In addition, the applicant proposes to add the following equipment to the existing off-line area.

- A glaze topcoat spray booth, flash area, curing oven, and cool-down area to complete the Glaze Line; and
- A second off-line accessory spray booth and curing oven to finish specialty components.

The conveyor line speed for the Glaze Line is expected to be approximately 15 feet per minute. Glaze is a specialty coating applied only on a limited amount of orders. Finishing would begin on one of the other four lines with the application of toner and stain. The cabinet would then be pulled from that line and finished on the Glaze Line. The final design is not yet complete. Exhaust flows are expected to be similar for each process area. Figure 1 shows a process flow chart for the finishing operations.

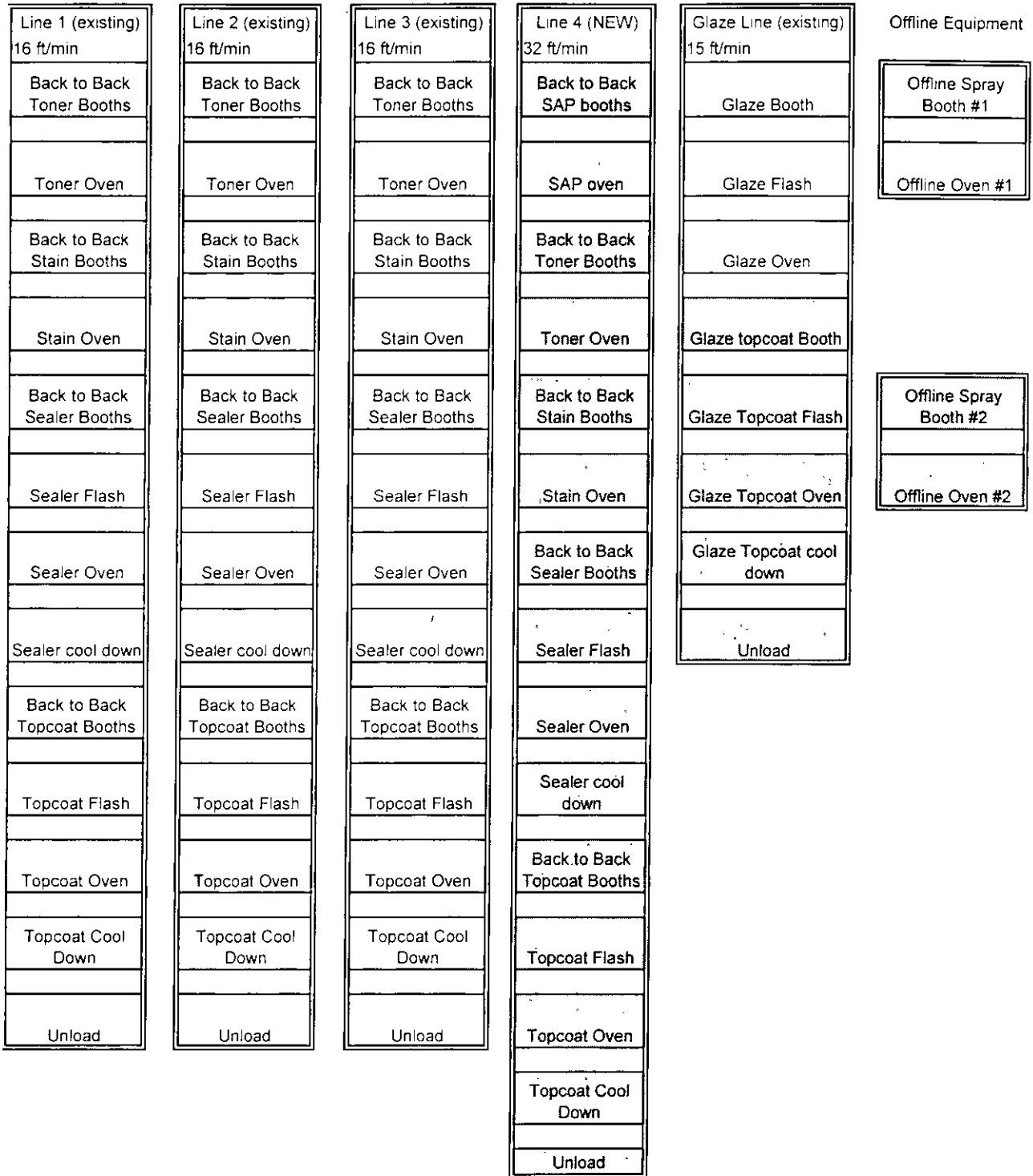
Operation of the new equipment will result in increases of VOC and organic HAP emissions. The permit currently limits VOC/HAP emissions to no more than 249 tons per year. Actual VOC emissions from the plant are approaching 200 tons per year. The addition of the 4<sup>th</sup> line will add another 166 tons per year of potential VOC/HAP emissions. With potential VOC/HAP emissions of 415 tons per year, the plant will become a PSD major facility. Subsequent projects must be reviewed for PSD applicability based on the PSD significant emissions rates in Table 62-212.400-2, which specifies 40 tons per year for VOC emissions. The applicant concludes that the proposed project is a minor modification to a PSD-minor facility.

Figure 1. Finishing Line Process Flow Chart

Merillat Ocala Plant - Finishing Line Process Flow Chart

"Light Grey" items are Existing Equipment

"Dark Grey" Items are New Equipment



**2. APPLICABLE REGULATIONS**

**State Regulations**

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Required Permits, Public Notice, Reports, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Requirements, and BACT Determinations Rule 62-212.300. General Preconstruction Review Requirements Rule 62-212.400. Prevention of Significant Deterioration (PSD Review Only)
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

The applicability of PSD preconstruction review (Rule 62-212.400, F.A.C.) is discussed at the end of this section.

**Federal Regulations**

The Environmental Protection Agency establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 identifies New Source Performance Standards (NSPS) for a variety of industrial activities. Part 61 specifies the National Emissions Standards for Hazardous Air Pollutant (NESHAP) based on specific pollutants. Part 63 identifies National Emissions Standards for Hazardous Air Pollutant (NESHAP) based on the Maximum Achievable Control Technology (MACT) for given source categories. These regulations are adopted by reference in Florida Rule 62-204.800, F.A.C. Specifically, the wood furniture finishing operations are subject to the provisions of NESHAP Subpart JJ in 40 CFR 63. The applicable requirements are currently included in the Title V air operation permit for the three existing finishing lines.

**General PSD Applicability**

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as defined in Rule 62-212.400, F.A.C. PSD preconstruction review is required in areas that are currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) for each regulated pollutant or areas designated as "unclassifiable" for such pollutants. A facility or project is considered "major" with respect to PSD if it emits or has the potential to emit:

- ≥ 250 tons per year of any regulated pollutant, or
- ≥ 100 tons per year of any regulated pollutant and belonging to one of 28 PSD Major Facility Categories, or
- ≥ 5 tons per year of lead.

Once a facility or project is considered "major" with regard to PSD, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates specified in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and subject to PSD preconstruction review. This means that the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each PSD-significant pollutant as well as evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, the project may be subject to PSD preconstruction review for several significant pollutants.

**PSD Applicability for Project**

The existing furniture manufacturing plant does not belong to any of the 28 PSD major facility categories listed in Table 62-212.400-1. Therefore, the PSD-major facility threshold for VOC emissions is 250 tons per year. The existing plant is considered a PSD-minor facility based on a federally enforceable condition limiting VOC emissions from the existing finishing lines to no more than 249 tons per year. The plant has not operated in excess of this limit and is currently in compliance with the condition. Based on the previously permitted equipment and the proposed project, there are three possible PSD applicability issues. These are discussed below.

1. *Does the existing permit specify any restriction taken to avoid PSD preconstruction review for a previous project? Will the proposed project relax this restriction?*

The original air construction permit (No. 0830137-001-AC) included a federally enforceable condition to limit VOC emissions from the existing finishing lines to no more than 249 tons per year. The limit was specifically taken to avoid PSD preconstruction review. Therefore, the VOC limit is subject to the following requirement in Rule 62-212.400(2)(g), F.A.C.

“Relaxations of Restrictions on Pollutant Emitting Capacity. If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it.”

The applicant does not propose to relax the existing VOC limit placed on Lines 1-3 and will continue to demonstrate compliance separately with this limit.

2. *Is the proposed project a PSD-major modification ( $\geq 250$  tons per year) when evaluated on its own potential emissions?*

The proposed project will add 166 tons per year of potential VOC emissions. This level is below the PSD-major facility threshold of 250 tons per year for VOC emissions. Therefore, evaluated on its own potential, the proposed project is not a PSD-major modification at a PSD-minor facility.

3. *Did the applicant phase the original project and the second project to avoid PSD applicability?*

The applicant originally submitted an application in May of 1999 to construct a wood furniture manufacturing plant. Based on the application and preliminary design, the Department’s Central District Office issued a minor source air construction permit in August of 1999. The permit authorized a series of application spray booths, flash-off areas, brush and wipe sanding stations, and curing ovens. The applicant recently provided sufficient information to show that the scope of the original plant was to produce 2600 cabinets per day with three finishing lines. Construction began on Lines 1 and 2 in early 2000. The plant began production in November of 2000. Construction of Line 3 was completed in 2003. The plant currently produces approximately 2400 to 2500 cabinets per day.

The applicant maintains that the new project is necessary to meet the following growing market demands over the current production of approximately 2500 cabinets per day: a 5-10% increase in the existing customer base; a 20-25% increase from new customers; and a projected overall increase in demand for cabinets in the Southeast and Florida in particular. Based on the timing and intent as provided by the applicant, the two projects are separate and distinct. Plans for each project were developed around individual circumstances and market drivers. The projects were not phased specifically to avoid PSD preconstruction review.

The project does not trigger PSD preconstruction review. However, issuance of the permit will make the plant a

## **TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

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PSD-major facility. Future projects will be reviewed for PSD applicability based on the PSD significant emissions rates in Table 62-212.400-2, which specifies 40 tons per year for VOC emissions.

### **3. PERMIT CONDITIONS**

The wood furniture finishing operations are primarily subject to the National Emissions Standards for Hazardous Air Pollutants in Subpart JJ of 40 CFR 63, which is adopted by reference in Rule 62-204.800, F.A.C. The applicable requirements of this rule are incorporated into the current Title V air operation permit for the existing finishing operations. Emissions averaging is used to demonstrate compliance by calculating the average volatile organic HAP coating concentrations for the range of products used over a month of operation. The new equipment will be subject to the same requirements. The draft air construction permit will summarize the NESHAP Subpart JJ provisions in an appendix.

VOC/HAP emissions from new Line 4 will be limited to 166 tons during any consecutive 12 months. Currently, Lines 1-3 are subject to a VOC/HAP limit of 249 during any consecutive 12 months. It will be necessary to determine compliance with these limits separately; otherwise, the project would create a relaxation of the original limit on Lines 1-3, which was taken to avoid PSD preconstruction review.

The draft air construction permit will include the material balance concept specified in the original permit (No. 0830137-001-AC) to determine VOC/HAP emissions. Basically, records are maintained on the VOC/HAP content of each material on site and the amount that each material is used during a given month. At the end of each month, the VOC/HAP emissions are estimated based on the conservative assumption that all VOC/HAP in the materials is emitted to the atmosphere. A 12-month rolling total is calculated to show compliance with each limit. Many of the records described are already kept due to the requirements of NESHAP Subpart JJ. The facility maintains an automated database to track and report emissions.

To simplify the separate record keeping requirements for Lines 1-3 and Line 4, it was determined to base emissions on cabinet production because the plant closely tracks this information. A "cabinet" is defined by the average cabinet size, which is considered to be a front plus a door, which makes the average cabinet approximately 30 inches by 30 inches. This is considered a cabinet because the top, sides, and insides are not generally finished. Over the 12-month averaging period for each limit, this method will provide accurate estimates.

Cabinets that are glazed, repaired, or that include a specialty component are removed from Lines 1-4 and finished at one of the off-line areas. To attribute emissions to either Lines 1-3 or Line 4, it was determined that cabinets finished in the offline areas and associated emissions will be associated with the line that first began finishing the cabinet or part, either Lines (1-3) or Line 4. This should provide a reasonable estimate because orders are initially assigned to each finishing line by the shipment location and tracked accordingly as a complete set.

The draft air construction permit will incorporate the underlying conditions of the original air construction permit and supersede that permit. This will allow the conditions to clearly identify the separate record keeping requirements.

### **4. PRELIMINARY DETERMINATION**

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

**PERMITTEE:**

Merillat Corporation, LLC  
1300 S.W. 38<sup>th</sup> Avenue  
Ocala, FL 34474

*Authorized Representative:*  
Mr. John Lewis, Acting Plant Manager

Air Permit No. 0830137-003-AC Permit Expires: December 1, 2006 Merillat Ocala Plant ARMS Facility ID No. 0830137 Project: Addition of 4 <sup>th</sup> Finishing Line
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**PROJECT AND LOCATION**

Merillat Corporation, LLC operates a wood furniture manufacturing plant (SIC No. 2434) located in Marion County at 1300 S.W. 38<sup>th</sup> Avenue in Ocala, Florida. The existing plant is located on SW 38<sup>th</sup> Street, between SR 40 and SW 20<sup>th</sup> Street. The UTM coordinates are Zone 17, 384.5 km East, and 3227.8 km North. Original construction of the plant began in 2000. The existing Ocala Plant consists of miscellaneous woodworking equipment and three finishing lines to produce wood cabinets for kitchens and baths. This permit authorizes the construction of a fourth finishing line.

**STATEMENT OF BASIS**

This air pollution construction 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.) and Title 40, Part 63, Subparts A and JJ of the Code of Federal Regulations. This permit incorporates the requirements of original Permit No. 0830137-001-AC and supersedes that permit. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

**CONTENTS**

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

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Michael G. Cooke, Director  
Division of Air Resource Management

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(Date)



## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

The Merillat Ocala Plant manufactures wooden kitchen and bath cabinets. It consists of woodworking equipment to fabricate and assemble wood components as well as finishing lines to apply coatings such as stains, glazes, toners, sealers, and topcoats. After completion of the 4<sup>th</sup> finishing line, the facility will consist of the following emissions units.

ID	Emission Unit Description
001	Wood Cabinet Finishing Lines 1, 2, and 3 (existing)
002	Wood Cabinet Finishing Line 4 (new construction)
003	Miscellaneous Woodworking Equipment (existing)

### REGULATORY CLASSIFICATION

Title III: The facility is a major source of hazardous air pollutants (HAP).

Title IV: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: Prior to this project, the existing facility was considered a PSD-minor facility in accordance with Rule 62-212.400, F.A.C. Upon issuance of this permit, the facility is now classified as a PSD-major source of air pollution. Future projects must be reviewed for PSD applicability in accordance with the significant emissions rates specified in Rule 62-212.400, F.A.C.

NESHAP: The wood furniture finishing operations are subject to the National Emissions Standards for Hazardous Air Pollutants in Subpart JJ of 40 CFR 63, which is adopted by reference in Rule 62-204.800, F.A.C.

### RELEVANT DOCUMENTS

The permit application and additional information received to make it complete are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: Applications for projects subject to PSD preconstruction review in accordance with Rule 62-212.400, F.A.C. shall be submitted to the Department's Bureau of Air Regulation at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate shall be submitted to the Air Resources Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Central District Office at 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (NESHAP Provisions) and Appendix E (Finishing Line Process Flow Chart).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 63 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
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 emissions unit or facility subject to this permit shall be constructed or 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. Relaxations of Restrictions on Pollutant Emitting Capacity. If a previously permitted facility or modification becomes a facility or modification which would be subject to the preconstruction review requirements of this rule if it were a proposed new facility or modification solely by virtue of a relaxation in any federally enforceable limitation on the capacity of the facility or modification to emit a pollutant (such as a restriction on hours of operation), which limitation was established after August 7, 1980, then at the time of such relaxation the preconstruction review requirements of this rule shall apply to the facility or modification as though construction had not yet commenced on it. [Rule 62-212.400(2)(g), F.A.C.]
8. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Wood Cabinet Finishing Lines 1 – 3 (EU-001) and Line 4 (EU-002)

This section of the permit addresses the following emissions units.

ID	Description
001	This emissions unit includes three identical manual application finishing lines (Lines 1, 2 and 3). Each finishing line consists of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks.
002	This emissions unit includes one manual application finishing line (Line 4) consisting of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks.

*{Permitting Note: Construction of Lines 1-3 began in 2000 in accordance with Permit No. 0830137-001-AC, which included a federally enforceable VOC limit to keep the project minor with respect to PSD preconstruction review. The conditions of Permit No. 0830137-001-AC are incorporated into this permit with minor revisions to provide detailed equipment descriptions and to specify the record keeping requirements necessary to ensure compliance with the original VOC limit separately from Line 4. The conditions of this permit supersede the conditions of Permit No. 0830137-001-AC.}*

#### FEDERAL REQUIREMENTS

1. **NESHAP:** The wood finishing lines are subject to NESHAP Subparts A and JJ in 40 CFR 63, which is adopted and incorporated by reference in Rule 62-204.800(26), F.A.C. Appendix D of this permit identifies the regulations. Currently, Title V air operation Permit No. 0830137-002-AV specifies the applicable NEHSAP Subpart JJ requirements for Lines 1-3, which will also be applicable to Line 4 upon completion of construction. [Rule 62-204.800, F.A.C. : 40 CFR 63, Subpart JJ]

#### EQUIPMENT

##### 2. Finishing Lines

- a. **Lines 1-3:** The permittee is authorized to construct and operate three identical finishing lines (Lines 1, 2 and 3). Each line consists of the following process areas and equipment:
  - A pair of back-to-back spray booths for each application of toners, stains, sealers and topcoats (8 spray booths per line);
  - A flash-off area following each pair of sealer and topcoat spray booths (2 flash-off areas per line);
  - A gas-fired curing oven following each pair of toner, stain, sealer, and topcoat spray booths (4 ovens per line); and
  - A cool-down area following each sealer and topcoat oven (2 cool-down areas per line).

*{Permitting Note: Lines 1-3 have already been constructed and are in operation. The conveyor line is designed for a maximum speed of approximately 16 feet per minute. For these lines, no new construction is authorized by the project.}*

- b. **Line 4:** The permittee is authorized to construct and operate a fourth finishing line. Line 4 consists of the following process areas and equipment:
  - A pair of back-to-back spray booths for the application of sap primer, toners, stains, sealers and topcoats (10 total booths);

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Wood Cabinet Finishing Lines 1 – 3 (EU-001) and Line 4 (EU-002)

- A flash-off area following each pair of sealer and topcoat spray booths;
- A gas-fired curing oven following each pair of sap primer, toner, stain, sealer, and topcoat spray booths (5 ovens per line); and
- A cool-down area following each sealer and topcoat oven (2 cool-down areas per line).

*{Permitting Note: Line 4 does not yet exist and will be new construction. The conveyor line is designed for a maximum speed of approximately 30 feet per minute.}*

- c. **Glaze Line:** The permittee is authorized to construct and operate a Glaze Line consisting of the following process areas and equipment: glaze booth, flash-off area, and oven followed by a topcoat booth, flash-off area, oven, and cool-down area. Cabinets finished on the Glaze Line and associated emissions shall be attributed to the line that first began finishing the cabinet, either Lines (1-3) or Line 4.

*{Permitting Note: The glaze booth, flash-off area, and oven have already been constructed and are in operation. The topcoat booth, flash-off area, oven, and cool-down area do not yet exist and will be constructed. The conveyor line speed is expected to be approximately 15 feet per minute. Glaze is a specialty coating applied only on a limited amount of orders. Finishing would begin on one of the other four lines with the application of toner and stain. The cabinet would then be pulled from that line and finished on the Glaze Line.}*

- d. **Offline Booths:** The permittee is authorized to construct and operate two offline systems, each consisting of a spray booth and oven. The offline spray booths see limited use in the repair of cabinets or finishing specialized parts. Cabinets finished in the Offline Booths and associated emissions shall be attributed to the line that first began finishing the cabinet or part, either Lines (1-3) or Line 4.

*{Permitting Note: Generally, coatings are manually applied by operators in spray booths using high-volume low-pressure (HVLP) spray equipment. NESHAP Subpart JJ also allows equivalent equipment such as air-assisted or airless spray equipment. Spray booths consist of three walls, a roof, and one open side for operator entry. Wood components are transferred between process areas by an overhead hanging conveyor system. A small rectangular opening in each end wall of each spray booth allows parts to enter and exit the booth on the conveyor line. Electric fans exhaust air from the process areas through roof stacks. Other areas along the conveyor line include hand operations such as stain wiping and sanding. See Appendix E for a flow chart of the finishing lines.}*

[Original Permit No. 0830137-001-AC: As Constructed; Application]

#### OPERATIONAL REQUIREMENTS

3. **Permitted Capacity:** The hours of operation are not limited (8760 hours per year). The permittee shall manage plant operations to ensure compliance with the VOC/HAP emissions limitations specified in this permit.

*{Permitting Note: Lines 1, 2 and 3 each have a capacity of approximately 865 cabinets per line per day based on current coatings, work flow, two shifts per day, and the maximum conveyor line speed. The capacity of Line 4 is approximately 1800 cabinets per line per day based on similar coatings, proposed work flow, two shifts, and a maximum conveyor line speed nearly twice that of the other lines.}*

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

4. **Authorized Fuel – Curing Ovens:** Each curing oven shall fire only natural gas or propane (SCC No. 4-02-008-10).

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. Wood Cabinet Finishing Lines 1 – 3 (EU-001) and Line 4 (EU-002)

*{Permitting Note: Lines 1-3 each include four ovens per line with a total maximum heat input rate of approximately 33 MMBtu per hour from all ovens. Line 4 will include five ovens with a total maximum heat input rate of approximately 18 MMBtu per hour from all ovens.}*

[Rule 62-210.200(PTE), F.A.C.]

5. Pollution Prevention (P<sup>2</sup>) Methods: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents (VOC/OS) without applying the following P<sup>2</sup> methods to minimize such emissions including, but not be limited to, the following:
- Tightly cover or close all VOC/OS containers when not in use;
  - When possible, tightly cover all open troughs, basins, baths, tanks, etc. when they are not in use;
  - Maintain all piping, valves, fittings, etc. in good operating condition;
  - Prevent excessive air turbulence across exposed containers of VOC/OS;
  - Immediately confine and clean up VOC/OS spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal;
  - Maintain appropriate records to demonstrate compliance with VOC/HAP emission limits.

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

#### EMISSIONS AND PERFORMANCE STANDARDS

##### 6. Emissions Standards

- Lines (1-3)*: Total combined volatile organic compound (VOC) emissions from Lines (1-3) shall not exceed 249.0 tons during any consecutive 12 months. Total combined hazardous air pollutant (HAP) emissions from Lines (1-3) shall not exceed 249.0 tons during any consecutive 12 months.
- Line 4*: Total volatile organic compound (VOC) emissions from Line 4 shall not exceed 166.0 tons during any consecutive 12 months. Total hazardous air pollutant (HAP) emissions from Line 4 shall not exceed 166.0 tons during any consecutive 12 months.

[Design; Original Permit No. 0830137-003-AC; Rules 62-210.200 (PTE), and 62-212.400(2)(g) (Relaxation Provision), F.A.C.]

7. Objectionable Odor - Prohibited: 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 defined as 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) and 62-210.200(181), F.A.C.]

#### MONITORING AND RECORDS

8. Material Content Records: For each VOC and HAP containing material in use at the plant (sap primers, stains, toners, sealers, topcoats, cleaning agents, etc.), the permittee shall keep records that identify each chemical constituent, the corresponding amount used, recognition as a VOC, and recognition as a HAP. Supporting documentation (i.e., chemical usage tracking logs, Material Safety Data Sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be maintained on site for each chemical and related product to include sufficient information to determine usage rates and associated emissions. An electronic database may be used to store and report such information. These records shall be made

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. Wood Cabinet Finishing Lines 1 – 3 (EU-001) and Line 4 (EU-002)**

available to the Department upon request. [Original Permit No. 0830137-003-AC; Rule 62-4.070(3), F.A.C.]

9. Monthly VOC Log: To demonstrate compliance with the VOC/HAP emissions limitations of this permit, the permittee shall keep a monthly log of the following information:
- a. Identify and quantify each material used at the facility that has a VOC or HAP emission.
  - b. Quantify the VOC and HAP emissions for the month and consecutive 12-month total.
  - c. Calculate and record the quantity of cabinets produced on Lines (1–3) and Line 4 separately.
  - d. Allocate the monthly VOC and HAP emissions between Lines (1–3) and Line 4 separately based on cabinet production. For example:

$$\text{VOC}_{1-3} = \frac{(\text{VOC}_{\text{total}})(\text{Cabinets}_{1-3})}{(\text{Cabinets}_{\text{total}})} \qquad \text{HAP}_{1-3} = \frac{(\text{HAP}_{\text{total}})(\text{Cabinets}_{1-3})}{(\text{Cabinets}_{\text{total}})}$$

Cabinets finished on the Glaze Line and Offline Booths shall be attributed to the line that first began finishing the cabinet, either Lines (1-3) or Line 4. It shall be assumed that all VOC/HAP in materials used are emitted to the atmosphere.

*{Permitting Note: "Cabinets" are tracked by the average cabinet size, which is typically a front plus a door approximately 30 inches by 30 inches. The top, sides, and insides are not typically finished.}*

- e. Calculate and record the total VOC and HAP emissions for Lines (1–3) and Line 4 for the 12-month rolling total.

The log shall be completed within 10 working days of the following month. The permittee may elect to test the effectiveness and reliability of flow meters to determine coating usage and emissions.

*{Permitting Note: It would require a modification of this air construction permit to change the compliance demonstration to a method based on flow meters.}*

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

10. Duration of Records: All records required by this permit shall be kept on site for at least 5 years from the date of the sample, measurement, record, report, or application. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. [Rules 62-4.070(3), 62-4.160(14), 62-213.440(1)(b), F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. Woodworking Operations (EU 003)

This section of the permit addresses the following emissions unit.

ID	Description
003	Woodworking operations include wood machining, sanding, fastening and gluing. Baghouse systems are used to control particulate matter emissions. Some baghouses return controlled exhaust air back into the building while others exhaust outside to the atmosphere through a series of rooftop stacks.

#### CONTROL EQUIPMENT

1. Baghouses: The permittee shall install, maintain, and operate a baghouse on each woodworking operation that exhausts process air containing wood shavings and/or sawdust to the outside air. Each baghouse shall be designed for no more than 0.03 grains of particulate matter per dscf (99% or better particulate matter removal efficiency). [Original Permit No. 0830137-001-AC]

#### PERFORMANCE RESTRICTIONS

2. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

3. Emissions Standards: The opacity from any baghouse exhausting to the outside air shall not exceed 5% based on a 6-minute average. The Department shall waive the particulate matter (PM) testing provided that baghouses are installed, operated, and maintained to effectively control PM emissions. However, the Department may require PM testing if it has reason to believe that emissions exceed specification of 0.03 grains per dry standard cubic foot. [Original Permit No. 0830137-001-AC; Rule 62-297.620(4), F.A.C.]

#### EMISSIONS PERFORMANCE TESTING

4. Opacity Tests: Within 30 days after being placed in operation, the permittee shall perform opacity observations for each baghouse vent that exhausts to the outside air to demonstrate compliance with the opacity standard. All tests shall be conducted in accordance with EPA Method 9 for at least 30 minutes with the associated woodworking process equipment in operation. [Original Permit No. 0830137-001-AC; Rule 62-297.310(4)(a)2, F.A.C.]
5. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. [Rule 62-297.310(7)(a)9, F.A.C.]
6. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix C (Common Conditions) of this permit. [Rule 62-297.310(8), F.A.C.]

**SECTION 4. APPENDICES**

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**CONTENTS**

- Appendix A. Citation Formats
- Appendix B. General Conditions
- Appendix C. Common State Regulatory Requirements
- Appendix D. NESHAP Provisions
- Appendix E. Finishing Line Process Flow Chart



**SECTION 4. APPENDIX A**  
**CITATION FORMATS**

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*The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.*

**REFERENCES TO PREVIOUS PERMITTING ACTIONS**

Old Permit Numbers

*Example:* Permit No. AC50-123456 or Air Permit No. AO50-123456

*Where:* “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

New Permit Numbers

*Example:* Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

*Where:* “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number  
“001” identifies the specific permit project  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

*Example:* Permit No. PSD-FL-317

*Where:* “PSD” means issued pursuant to the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project

**RULE CITATION FORMATS**

Florida Administrative Code (F.A.C.)

*Example:* [Rule 62-213.205, F.A.C.]

*Means:* Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

*Example:* [40 CFR 60.7]

*Means:* Title 40, Part 60, Section 7

## SECTION 4. APPENDIX B

### GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

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 these 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 and 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 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 no 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 not 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 permittee 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 or 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 and records 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.

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 noncompliance, 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

## SECTION 4. APPENDIX B

### GENERAL CONDITIONS

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:
  - a. Determination of Best Available Control Technology (Not Applicable);
  - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
  - c. Compliance with New Source Performance Standards (Not Applicable).
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 or 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:
    - 1) The date, exact place, and time of sampling or measurements;
    - 2) The person responsible for performing the sampling or measurements;
    - 3) The dates analyses were performed;
    - 4) The person responsible for performing the analyses;
    - 5) The analytical techniques or methods used; and
    - 6) 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.

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

*{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}*

**EMISSIONS AND CONTROLS**

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
4. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
5. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
6. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means 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) and 62-210.200(203), F.A.C.]
7. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
8. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

**TESTING REQUIREMENTS**

9. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
10. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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. [Rule 62-297.310(2), F.A.C.]

11. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
12. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
- a. *Required Sampling Time*. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
  - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
  - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

13. Determination of Process Variables

- a. *Required Equipment*. The owner or operator of an emissions 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.
- b. *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), F.A.C.]

14. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
15. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
17. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

- 1. The type, location, and designation of the emissions unit tested.

**SECTION 4. APPENDIX C**  
**COMMON CONDITIONS**

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2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**RECORDS AND REPORTS**

18. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
19. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

**SECTION 4. APPENDIX D**  
**NESHAP PROVISIONS**

**Rule 62-204.800, F.A.C. Federal Regulations Adopted by Reference**

(11) Chapter 40 of the Code of Federal Regulations

Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories.

(a) **Definitions.** For the purposes of subsection 62-204.800(10), F.A.C., the definitions contained in the various provisions of 40 CFR Part 63 adopted herein shall apply, except that the term, "Administrator," when used in any provisions of 40 CFR Part 63 that is delegated to the Department by the U.S. Environmental Protection Agency, shall mean the Secretary or the Secretary's designee.

(b) **Standards Adopted.** The following National Emission Standards for Hazardous Air Pollutants contained in 40 CFR Part 63, revised as of July 1, 2001, or later as specifically indicated, are adopted and incorporated by reference:

26. *40 CFR 63, Subpart JJ, Wood Furniture Manufacturing Operations; amended June 23, 2003, at 68 FR 37333; except that the Secretary is not the Administrator for purposes of 40 CFR 63.808(c)(1) through (5).*

(c) The National Emission Standards for Hazardous Air Pollutants adopted by reference in this rule shall be controlling over other standards in the air pollution rules of the Department, except that any emissions limiting standard contained in or determined pursuant to the air pollution rules of the Department which is more stringent than one contained in a National Emission Standard, or which regulates pollutants or emissions units not regulated by an applicable National Emission Standard, shall apply.

(d) **General Subparts Adopted.** The following general subparts of 40 CFR Part 63, revised as of July 1, 2001, or later as specifically indicated, are adopted and incorporated by reference.

1. 40 CFR Part 63, Subpart A, General Provisions: amended February 27, 2002, at 67 FR 9156; amended April 5, 2002, at 67 FR 16581; amended February 18, 2003, at 68 FR 7706; amended April 21, 2003, at 68 FR 19375; amended May 20, 2003, at 68 FR 27645; amended May 23, 2003, at 68 FR 28605; amended May 27, 2003, at 68 FR 28774; amended May 28, 2003, at 68 FR 31745; amended May 29, 2003, at 68 FR 32171; amended May 30, 2003, at 68 FR 32585; amended November 13, 2003, at 68 FR 64431; amended December 19, 2003, at 68 FR 70959; amended January 2, 2004, at 69 FR 129; amended February 3, 2004 at 69 FR 5038; amended April 19, 2004, at 69 FR 20967; amended April 22, 2004, at 69 FR 21905; amended April 26, 2004, at 69 FR 22601; amended July 30, 2004, at 69 FR 45943; except that the Secretary is not the Administrator for purposes of 40 CFR 63.5(e), 40 CFR 63.5(f), 40 CFR 63.6(g), 40 CFR 63.6(h)(9), 40 CFR 63.6(j), 40 CFR 63.13, and 40 CFR 63.14.

2. 40 CFR Part 63, Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j): amended April 5, 2002, at 67 FR 16581; is adopted and incorporated by reference, subject to the following provisions.

a. The "effective date of Section 112(g)(2)(B)" as defined in 40 CFR 63.41 shall be July 1, 1997.

b. The "Notice of MACT Approval" as defined in 40 CFR 63.41 shall be the air construction permit.

c. The "permitting authority" as defined in 40 CFR 63.41 shall be the Department.

d. In lieu of the administrative procedures for review of the Notice of MACT Approval as set forth in 40 CFR 63.43(f)(1) through (5), the Department will follow the permit processing procedures of Rule 62-4.055, F.A.C.

e. In lieu of the opportunity for public comment on the Notice of MACT Approval as set forth in 40 CFR 63.43(h), the Department will provide opportunity for public comment on the Notice of MACT Approval pursuant to Rule 62-210.350, F.A.C.

f. The Notice of MACT Approval shall become effective upon issuance of the air construction permit by the Department.

3. 40 CFR Part 63, Subpart C, List of Hazardous Air Pollutants, Petitions Process, Lesser Quantity Designations, Source Category List, revised as of July 1, 2004; amended November 29, 2004, at 69 FR 69320.

**SECTION 4. APPENDIX D**

**NESHAP PROVISIONS**

4. 40 CFR Part 63, Subpart D. Compliance Extensions for Early Reductions of Hazardous Air Pollutants, except any notice required to be published by the Department shall be prepared by the Department and published by the applicant with proof of publication submitted to the Department.
  5. 40 CFR Part 63, Subpart E, Approval of State Programs and Delegation of Federal Authorities; Section 63.90, Program Overview, only.
- (e) Appendices Adopted. The following appendices of 40 CFR Part 63, revised as of July 1, 2001, or later as specifically indicated, are adopted and incorporated by reference:
1. Appendix A, Test Methods.
  2. Appendix B, Sources Defined for Early Reduction Provisions.
  3. Appendix C, Determination of the Fraction Biodegraded (Fbio) in a Biological Treatment Unit.
  4. Appendix D, Alternative Validation Procedure for EPA Waste and Wastewater Methods.
  5. Appendix E, Monitoring Procedure for Non-thoroughly Mixed Open Biological Treatment Systems at Kraft Pulp Mills Under Unsafe Sampling Conditions.

**40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations**

The following summarizes the generally applicable federal regulations. The applicable provisions are currently specified in the Title V air operation permit and are not repeated here.

<u>Sec.</u>	<u>Title</u>
63.800	Applicability.
63.801	Definitions.
63.802	Emission limits.
63.803	Work practice standards.
63.804	Compliance procedures and monitoring requirements.
63.805	Performance test methods.
63.806	Recordkeeping requirements.
63.807	Reporting requirements.
63.808	Delegation of authority.
63.809-63.819	Reserved.

- Table 1. General Provisions (NESHAP Subpart A) Applicability to Subpart JJ  
Table 2. List of Volatile Hazardous Air Pollutants  
Table 3. Summary of Emissions Limits  
Table 4. Pollutants Excluded from Use in Cleaning and Washoff Solvents  
Table 5. List of VHAP of Potential Concern Identified by Industry  
Table 6. VHAP of Potential Concern

Part 63, Appendix A: Test Methods Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection into a Gas Chromatograph

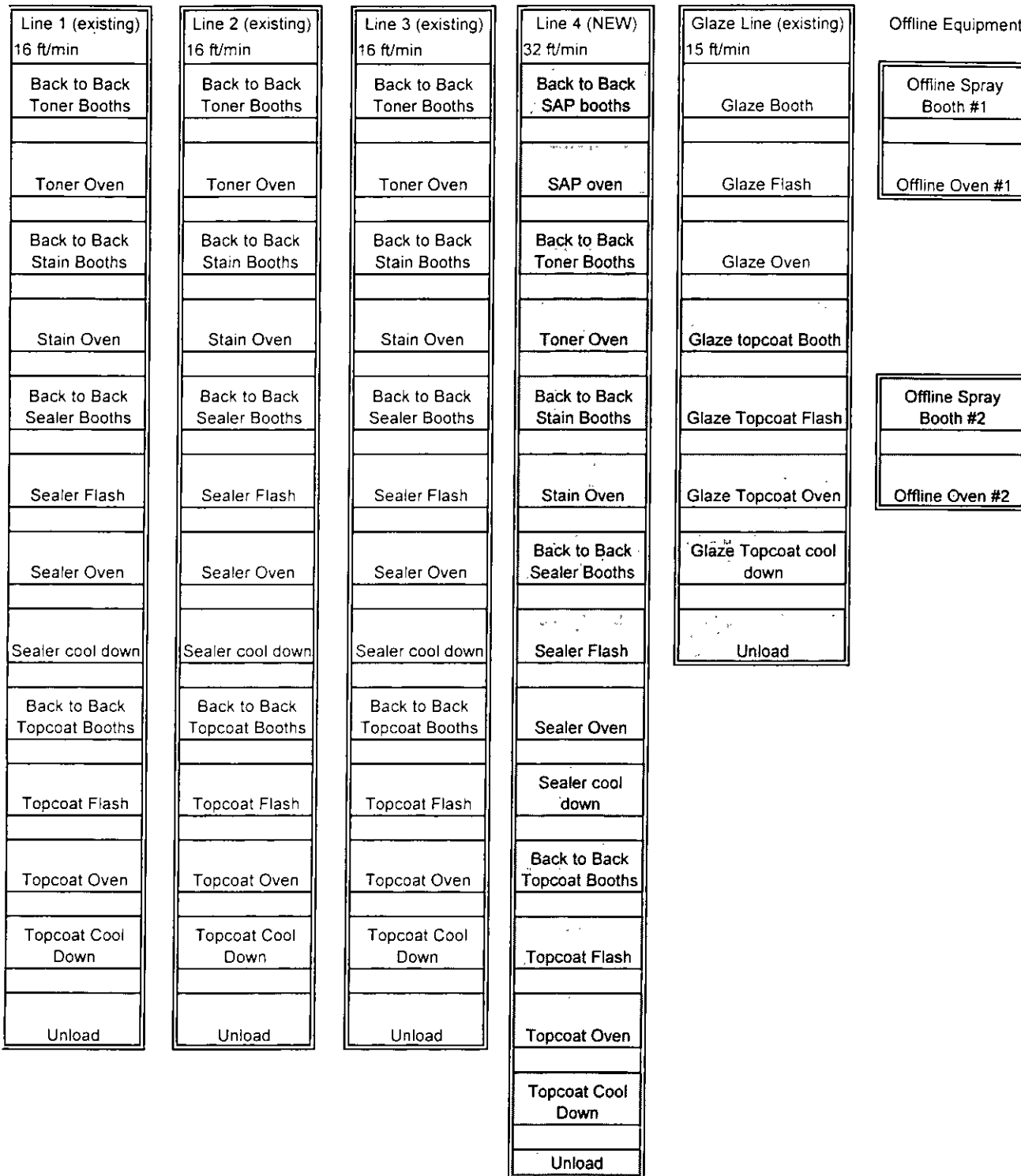


**SECTION 4. APPENDIX E**  
**FINISHING LINE PROCESS FLOW CHART**

**Merillat Ocala Plant - Finishing Line Process Flow Chart**

"Light Grey" items are Existing Equipment

"Dark Grey" Items are New Equipment



P.E. CERTIFICATION STATEMENT

PERMITTEE

Merillat Corporation, LLC  
1300 S.W. 38<sup>th</sup> Avenue  
Ocala, FL 34474

Draft Air Permit No. 0830137-003-AC  
Ocala Plant - Addition of 4<sup>th</sup> Line  
Marion County, Florida

PROJECT DESCRIPTION

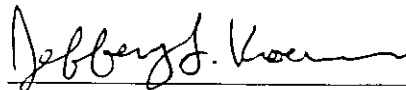
The existing facility includes woodworking and finishing operations for the manufacturing of bath and kitchen cabinets. The cabinet components are constructed in the woodworking areas then moved, via hanging chain conveyor systems, through three finishing lines. There are three identical existing lines (Lines 1-3) used to finish cabinets. Each line is used to apply toners, stains, sealers, and topcoats resulting in emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). VOC and HAP emissions generated from the surface coating operations are captured and vented to the atmosphere using a system of hoods, ductwork, fans, and stacks. The components are then assembled, packaged, and loaded for immediate shipping.

The wood furniture finishing operations are subject to the National Emissions Standards for Hazardous Air Pollutants in Subpart JJ of 40 CFR 63, which is adopted by reference in Rule 62-204.800, F.A.C. Emissions control is based on reduced solvent coatings. Emissions averaging is used to demonstrate compliance by calculating the average volatile organic HAP coating concentrations for the range of products used over a month of operation. The current permit also limits VOC/HAP emissions to no more than 249 tons per year. Actual VOC emissions from the plant are approaching 200 tons per year.

The applicant proposes to add a 4<sup>th</sup> finishing line consisting of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. The new line is also subject to the requirements in Subpart JJ of 40 CFR 63. Allowable VOC/HAP emissions will be limited to 166 tons during any consecutive months.

The existing plant is a PSD-minor facility based on the VOC limit of 249 tons per year for the installed equipment (Lines 1-3). The applicant does not request a relaxation of this limit. The new project (Line 4) will have allowable VOC emissions of 166 tons per year, which is not a major modification by itself. The new project is considered to be separate and distinct from the original project and is not a phased project. Therefore, the project does not trigger PSD preconstruction review. The draft permit includes record keeping and reporting requirements to ensure compliance with the two separate VOC limits.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*



Jeffery F. Koerner, P.E.  
Registration Number: 49441

6-2-05

(Date)

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John Lewis  
 Merillat Ocala Plant  
 1300 S.W. 38<sup>th</sup> Avenue  
 Ocala, Florida 34474

2. Article Number  
 (transfer from service label)

7001 0320 0001 3692 2831

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *John Dodge*  Agent  
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

L. DODGE 9/10/05

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- Certified Mail  Express Mail
- Registered  Return Receipt for Merchandise
- Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 2831

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
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Mr. John Lewis  
 Merillat Ocala Plant  
 1300 S.W. 38<sup>th</sup> Avenue  
 Ocala, Florida 34474

PS Form 3800, January 2001

See Reverse for Instructions