

Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

NOTICE OF PERMIT

CERTIFIED MAIL
P 183 853 414

Merillat Corporation
5353 West U.S. No. 223
Adrian, MI 49221

Attention: John D. Thurman, Vice President - Finance & Treasurer

Marion County - AP
Ocala Wood Furniture Manufacturing Facility

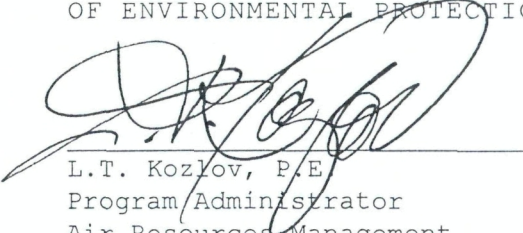
Dear Mr. Thurman:

Enclosed is Permit Number 0830137-001-AC to construct the above referenced source issued pursuant to Section(s) 403.087, Florida Statutes.

Any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Date: 8-6-99

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

P 183 853 414

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	JOHN D THURMAN
Street & Number	VICE PRESIDENT - FINANCE MERILLAT CORPORATION
Post Office, State, & ZIP Code	5353 WEST US 223
ADRIAN MI 49221	Postage \$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	MARION 8/6/99
	0830137-001-AC
	MERILLAT CORPORATION PERMIT

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

JOHN D THURMAN
 VICE PRESIDENT - FINANCE & TREASURY
 MERILLAT CORPORATION
 5353 WEST U S 223
 ADRIAN MI 49221

4a. Article Number

P183 853 414

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Insured |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD |

7. Date of Delivery

AUG 12 1999

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

John D Thurman

8. Addressee's Address (Only if requested and fee is paid)

MARION
 0830137-001-AC
 JE MLE

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE

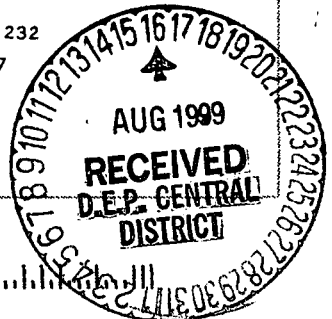


First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT

3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FL 32803-3767



FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Dina Jones Aug. 6, 1999
Clerk Date

AD
WJE
LTK/wje

Copies furnished to:

Victor A. Hurlburt, P.E. - Malcolm Pirnie, Inc.

Joel S. Cohn, P.E. - Malcolm Pirnie, Inc.

Jim Olszewski - Merillat Industries, Manager of Facilities, Engineering & Environmental Services

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on Aug 6, 1999 to the listed persons, by Dina Jones.



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

Permittee:

Merillat Corporation
5353 West U.S. No. 223
Adrian, MI 49221

Permit No.: 0830137-001-AC
Facility ID No.: 0830137
Expiration Date: July 31, 2004

Attention: John D. Thurman,
Vice President - Finance
& Treasurer

County: Marion
Latitude/Longitude: 29°10'30"N/82°11'15"W
Project: Ocala Wood Furniture
Manufacturing Facility

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee may construct a wood furniture manufacturing facility that will include woodworking and finishing operations for the manufacturing of kitchen and bath cabinets.

Woodworking operations shall include wood machining, gluing, and sanding. Baghouse systems shall be used to control particulate emissions, provide at least 99% particulate removal efficiency, and exhausted to the atmosphere through a series of rooftop stacks.

Finishing operations shall consist of a series of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. Parts shall be transferred between process stations by an overhead conveyor system. Toners, stains, clear coat sealers, and clear topcoats may be applied to parts as necessary to produce the desired product; however, application shall be performed manually, by operators in spray booths, using high-volume, low-pressure (HVLP) spray guns.

Additionally, the permittee may construct off-line spray booths for part touch-up or repair, special parts or products, or special colors. Also, a "top shop" side operation may be constructed to produce laminated cabinet tops. This operation shall include machining operations, glue application, and a final edge trim step. Particulate emissions from the "top shop" operations shall be controlled by a dust collection system.

This facility is classified as Title V, a major source of hazardous air pollutants (HAPS), and is subject to the applicable requirements of Title 40, Code of Federal Regulations (CFR), Part 63, Subpart A - General Provisions, and Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

These sources are located on SW 38th Avenue, between SR 40 and SW 20th Street in Ocala, Marion County, Florida.

General Conditions, which are pages 2 and 3, are mailed only to the permittee.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.) 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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this 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 and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup and 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 reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of this 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 noncompliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

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.

GENERAL CONDITIONS:

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 Section 403.111 and 403.73, F.S. 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 Rule 62-4.120 and '62-30.300, Florida Administrative Code (F.A.C.), as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
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 information) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 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;
 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 the 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.

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

**TITLE 40 - CODE OF FEDERAL REGULATIONS - PART 63 - SUBPART JJ
NATIONAL EMISSION STANDARDS FOR WOOD FURNITURE MANUFACTURING OPERATIONS**

63.800 Applicability

1. The permittee shall comply with the requirements of 40 CFR Part 63 Subpart A (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 40 CFR Part 63 Subpart JJ. However, the provisions that apply only to sources using a control device do not apply to this facility.

[Rule 62-204.800(10)(b)20., F.A.C., 40 CFR 63.800(d) and permit application]

63.802 Emission limits

1. The permittee shall:

[Rule 62-204.800(10)(b)20., F.A.C., 40 CFR 63.802(b) and permit application]

(a) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of 40 CFR Part 63 Subpart JJ using the compliance method in Sec. 63.804(d)(1). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in Sec. 63.803(1)(2) for determining styrene and formaldehyde usage.

(b) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in Sec. 63.804(e).

(c) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

63.803 Work practice standards

1. **Work practice implementation plan.** The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs 2 through 12 of this section. The plan shall be developed no more than 60 days after operations begin at the facility. The written work practice implementation plan shall be available for inspection by the Department upon request. If the Department determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs 2 through 12 of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Department may require the affected source to modify the plan.

[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(a)]

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

2. **Operator training course.** The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of 40 CFR Part 63 Subpart JJ. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(b)]

- (a) A list of all current personnel by name and job description that are required to be trained;
- (b) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- (c) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- (d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

3. **Inspection and maintenance plan.** The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(c)]

- (a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- (b) An inspection schedule;
- (c) Methods for documenting the date and results of each inspection and any repairs that were made;
- (d) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

4. **Cleaning and washoff solvent accounting system.** The permittee shall develop an organic HAP solvent accounting form to record:
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(d)]
 - (a) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801;
 - (b) The number of pieces washed off, and the reason for the washoff; and
 - (c) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

5. **Chemical composition of cleaning and washoff solvents.** The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(e)]

6. **Spray booth cleaning.** The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(f)]

7. **Storage requirements.** The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(g)]

8. **Application equipment requirements.** The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances: [Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(h)]
 - (a) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (b) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (c) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

- (d) When emissions from the finishing application station are directed to a control device;
 - (e) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - (f) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - (i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
9. **Line cleaning.** The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(i)]
10. **Gun cleaning.** The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(j)]
11. **Washoff operations.** The permittee shall control emissions from washoff operations by: [Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(k)]
- (a) Using normally closed tanks for washoff; and
 - (b) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
12. **Formulation assessment plan for finishing operations.** The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
[Rule 62-204.800(10)(b)20., F.A.C. and 40 CFR 63.803(l)]
- (a) Identifies VHAPs from the list presented in Table 5 of 40 CFR Part 63 Subpart JJ that are being used in finishing operations at the facility;
 - (b) Establishes a baseline level of usage for each VHAP identified in paragraph 12(a). The baseline usage level shall be the de minimis quantity listed in Table 5 of 40 CFR Part 63 Subpart JJ.

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

- (c) Tracks the annual usage of each VHAP identified in paragraph 12(a) by the facility that is present in amounts subject to MSDS reporting as required by OSHA.
- (d) If the annual usage of the VHAP identified in paragraph 12(a) exceeds its baseline level, then the permittee shall provide a written notification to the air compliance section of the FDEP Central District Office that quantifies and describes the reasons for the exceedance(s). The following explanations would relieve the permittee from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
 - (i) The exceedance is no more than 15.0 percent above the baseline level; or
 - (ii) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
- (e) If neither of the above explanations is the reason for the exceedance, the permittee shall confer with the permitting authority to discuss the reason for the exceedance and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and permittee. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (f) If the permittee uses a VHAP of potential concern listed in Table 6 of 40 CFR Part 63 Subpart JJ, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The permittee shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of 40 CFR Part 63 Subpart JJ for that chemical, then the affected source shall provide an explanation to the air compliance section of the FDEP Central District Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph 12(d), the permittee shall follow the procedures established in 12(e).

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

63.804 Compliance procedures and monitoring requirements

1. The permittee shall comply with 40 CFR 63.802(b)(1) by calculating the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;
[Rule 62-204.800(10)(b)20., F.A.C., 40 CFR 63.804(d)(1) and permit application]

EQUATION 1

$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n)}{(M_{c1} + M_{c2} + \dots + M_{cn})}$$

where:

- C_c = the VHAP concentration of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP / kg solids), as applied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP / lb solids);
- E = the emission limit achieved by an emission point or a set of emission points, in kg VHAP / kg solids (lb VHAP / lb solids);
- M = the mass of solids in finishing material used monthly, kg solids / month (lb solids / month);
- S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials; and
- W = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.

2. The permittee shall comply with 40 CFR 63.802(b)(2) by using compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied.
[Rule 62-204.800(10)(b)20., F.A.C., 40 CFR 63.804(e)(1) and permit application]
3. *Initial Compliance.* [Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.804(f)]
 - (a) Owners or operators shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by Sec. 63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.
 - (b) Owners or operators shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that compliant contact adhesives are being used by the affected source.
 - (c) Owners or operators shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

(d) Owners or operators shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

4. *Continuous compliance demonstrations.*

[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.804(g)]

(a) The permittee shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).

(i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 0.8. An affected source is in violation of the standard if E is greater than 0.8 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(b) The permittee shall submit a compliance certification with the semiannual report required by Sec. 63.807(c).

(i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(c) The permittee shall submit a compliance certification with the semiannual report required by Sec. 63.807(c).

(i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(d) The permittee shall submit a compliance certification with the semiannual report required by Sec. 63.807(c).

(i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

63.805 Performance test methods

1. The EPA Method 311 of appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Department that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Department to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1). [Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.805(a)]

63.806 Recordkeeping requirements.

1. The permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10, according to the applicability criteria in 40 CFR 63.800(d). [Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(a)]
2. The permittee shall maintain records of the following: [Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(b)]
 - (a) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in 40 CFR 63.802; and
 - (b) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in 40 CFR 63.802; and
 - (c) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 CFR 63.802(b)(3).

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

3. The permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1. [Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(c)]
4. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(e)]
 - (a) Records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place;
 - (b) Records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c);
 - (c) Records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d);
 - (d) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 CFR 63.803(h)(5).
 - (e) Records associated with the formulation assessment plan required by 40 CFR 63.803(l); and
 - (f) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
5. The permittee shall maintain records of the compliance certifications submitted in accordance with 40 CFR 63.807(c) for each semiannual period following the compliance date.
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(h)]
6. The permittee shall maintain records of all other information submitted with the compliance status report required by 40 CFR 63.9(h) and 63.807(b) and the semiannual reports required by 40 CFR 63.807(c).
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(i)]
7. The permittee shall maintain all records in accordance with the requirements of 40 CFR 63.10(b)(1).
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.806(j)]

63.807 Reporting requirements

1. The permittee shall fulfill all reporting requirements of 40 CFR 63.7 through 63.10 according to the applicability criteria in 40 CFR 63.800(d).
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.807(a)]

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

2. The permittee shall submit the compliance status report required by 40 CFR 63.9(h) no later than 60 days after the compliance date. The report shall include the information required by 40 CFR 63.804(f) (1), (5), (7), and (8).
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.807(b)]

3. The permittee shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.807(c)]
 - (a) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
 - (b) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
 - (c) The semiannual reports shall include the information required by 40 CFR 63.804(g) (1), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
 - (d) The frequency of the reports required by paragraph 3 of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

4. If required to provide a written notification under 40 CFR 63.803(1)(4), the permittee shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.
[Rule 62-204.800(10)(b)20., F.A.C.; 40 CFR 63.807(e)]

(Note: 40 CFR Part 63 Subpart JJ was amended by EPA in the Federal Register, December 28, 1998, Vol. 63, No. 248, pp. 71376-71385.)

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

OPERATING CONDITIONS

1. The curing ovens may burn natural gas or propane only.
[Rule 62-210.200, (PTE), F.A.C.]
2. Volatile organic compound (VOC) usage at the facility shall not exceed 249 tons per consecutive 12 months. Also, combined hazardous air pollutant (HAP) usage, or any single HAP usage at the facility shall not exceed 249 tons per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C.]
3. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly [Rule 62-210.650, F.A.C.]
4. 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)(a), F.A.C.]. To comply, procedures to minimize pollutant emissions should include but not be limited to the following:
 - a) tightly cover or close all VOC containers when they are not in use,
 - b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
 - c) maintain all piping, valves, fittings, etc. in good operating condition,
 - d) prevent excessive air turbulence across exposed VOC's,
 - e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal,
 - f) maintain appropriate recordkeeping practices to demonstrate compliance with VOC usage limits.
5. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

EMISSION LIMITS

6. The total VOC emission limit for this facility is 249 tons per consecutive 12 months. The combined HAP emission limit and the single HAP emission limit for this facility is 249 tons per consecutive 12 months.
[Rule 62-210.200, (PTE), F.A.C.]
7. Emissions from the baghouse systems are limited to less than 5% opacity. The Department shall waive the particulate matter (PM) test specified in rule 62-296.712, F.A.C. provided that the permittee uses the baghouses as described in the application received May 25, 1999. However, the Department may require PM

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

testing if it has reason to believe that emissions exceed 0.03 grains per dry standard cubic foot. [Rule 62-297.620(4), F.A.C. and permit application]

COMPLIANCE TESTING

8. Each particulate emission unit must be tested for visible emissions in accordance with DEP Method 9 for 30 minutes or the length of the batch/cycle within 30 days after being placed in operation. For any other approved method to be utilized, the Department must give prior written approval.
[Rule 62-297.310(4)(a)2., F.A.C.]
9. **Prior to compliance testing, the permittee shall submit detailed equipment information to the Department.** At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Compliance Section in the Air Section of the Central District Office of the Department of Environmental Protection. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9., F.A.C.]
10. Testing of emissions shall be conducted with the emissions unit operation 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 minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]
11. The owner or operator shall submit a copy of the compliance test results to the air compliance section of this office within 45 days after the last sampling run of each test is completed [Rule 62-297.310(8)(b), F.A.C.]
12. Pursuant to Rule 62-4.070(3), F.A.C., a monthly log shall be kept for this facility to document compliance with the limitations of Specific Conditions 2 and 6. The log shall be completed by the end of the following month and retained on file at the facility for at least three years. At a minimum, the monthly log shall:
 - a) Identify and quantify each material used at the facility that has an air pollution emission.
 - b) Quantify the consecutive 12 month period total of emissions from VOCs and HAPs.

Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle.) Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient

Permittee:
Merillat Corporation
Attn: John D. Thurman
SPECIFIC CONDITIONS:

Facility ID Number: 0830137
Permit Number: 0830137-001-AC
Expiration Date: July 31, 2004
County: Marion

information to determine usage rates and emissions. These records shall be made available to the Department upon request.

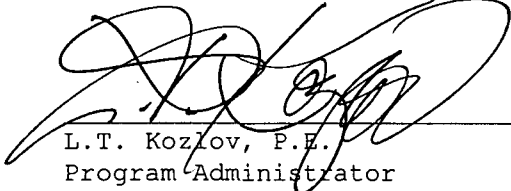
13. The owner or operator shall complete DEP Form No. 62-210.900(5), F.A.C. "Annual Operating Report for Air Pollutant Emitting Facility", including the Emissions Report, for each calendar year and submit to the air compliance section of this office on or before March 1 of the following year.
[Rule 62-210.370(3), F.A.C.]

PERMIT APPLICATION

14. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing at least 90 days prior to the expiration of the construction permit and submit an application for an extension of the construction permit.

An operating permit is required for operation of this source. To obtain an operating permit, the permittee must demonstrate compliance with the conditions of the construction permit and submit the application fee, along with compliance test results, detailed equipment information and Application for Air Permit to the Department's Central Florida District office [Rule 62-4.220, F.A.C.] **The application shall be submitted no later than 180 days after the source has been placed in operation.**

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Issued: 8-6-99