

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

Certified Mail

7001 0360 0000 8773 3355

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

John Bankey, Director of Operations
Merillat Corporation
1300 S.W. 38th Avenue
Ocala, FL 34474

FINAL Permit No.: 0830137-002-AV
Facility ID No.: 0830137
SIC Nos.: 24,2434
Project: Cabinet Manufacturing Facility

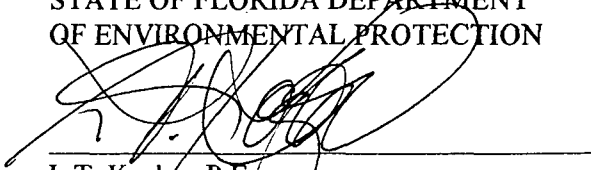
Dear Mr. Bankey:

Enclosed is FINAL Permit Number 0830137-002-AV for the operation of the Merillat Corporation Facility, located at 1300 S.W. 38th Avenue, Ocala, Marion County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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


LTK/aze

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 MERRILLAT CORPORATION
 1300 SW 38TH AVENUE
 OCALA FL 34474

PS Form 3800, January 2001 See Reverse for Instructions

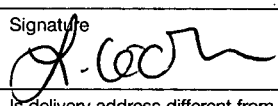
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1. Article Addressed to:

JOHN BANKEY DIRECTOR OF OPERATIONS
 MERRILLAT CORPORATION
 1300 S W 38TH AVENUE
 OCALA FL 34474

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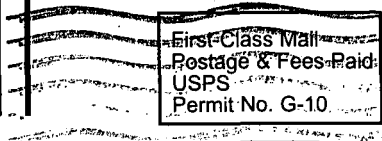
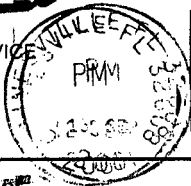
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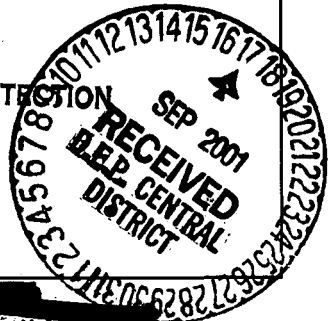


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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT

3919 MAGUIRE BLVD., SUITE 232
ORLANDO, FL 32803 - 3767



2803/3710

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) and all copies were sent by certified mail before the close of business on September 10, 2001 to the person(s) listed:

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this NOTICE OF FINAL PERMIT (including the FINAL permit) were sent by U.S. mail on the same date to the person(s) listed:

Enclosures
copy furnished to:

John Bankey, Director of Operations
Merillat Corporation
1300 S.W. 38th Avenue
Ocala, FL 34474

Victor A. Hurlburt, P.E.
Bruce Mitchell, DARM, BAR, Title V Section
Mr. Joel Huey - USEPA Region IV

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.

Brian Jones Sept 10, 2001
(Clerk) (Date)

Merillat Corporation
Facility ID No.: 0830137
Marion County

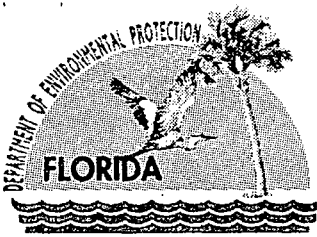
Title V Air Operation Permit
FINAL Permit No.: 0830137-002-AV

Permitting Authority:
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334
Fax: 407/897-5963

Title V Air Operation Permit
Merillat Corporation
Cabinet Manufacturing Facility
FINAL Permit No.: 0830137-002-AV

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Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
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David B. Struhs
Secretary

Permittee:
Merillat Corporation
1300 S.W. 38th Avenue
Ocala, FL 34474

FINAL Permit No.: 0830137-002-AV
Facility ID No.: 0830137
SIC Nos.: 24,2434
Project: Cabinet Manufacturing Facility

Attn: John Bankey, Director of Operations

This permit is for the operation of the Merillat Corporation cabinet manufacturing facility located at 1300 S.W. 38th Avenue, Ocala, Marion County; Latitude: 29° 10' 30" North and Longitude: 82° 11' 15" West.

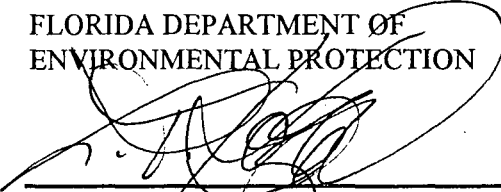
STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-3, TITLE V CONDITIONS (version dated 4/30/99)

Renewal Application Due Date: February 28, 2006
Expiration Date: August 30, 2006

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION



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

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Section I. Facility Information.

Subsection A. Facility Description.

Merillat Corporation produces wooden kitchen and bathroom cabinets.

Also included in this permit are miscellaneous unregulated/insignificant emission units and/or activities.

Based on the Title V permit renewal application received February 28, 2001, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
001	Cabinet Manufacturing

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

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

The permittee may operate off-line spray booths for part touch-up or repair, special parts or products, or special colors. A "top shop" side operation produces laminated cabinet tops. This operation includes machining operations, glue application, and a final edge trim step. Particulate emissions from the "top shop" operations are 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.

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix B, TITLE 40 Code of Federal Regulations – Part 63 – Subpart JJ

Appendix H-1, Permit History / ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received February 28, 2001

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS (version dated 4/30/99), is a part of this permit. APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.

2. Not Federally Enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. 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.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable; and

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

6. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), F.A.C.]

7. Not Federally Enforceable. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include 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.;

- c. Maintain all piping, valves, fittings, etc. in good operating condition;
- d. Prevent excessive air turbulence across exposed VOC; and
- e. Immediately confine and clean up spills of VOC containing materials.

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

8. All reasonable precautions shall be taken as necessary to prevent emissions of unconfined particulate matter at this facility. Reasonable precautions shall include, but not be limited to, the following:

- a. Chemical or water application to unpaved roads and unpaved yard areas;
- b. Paving and maintenance of roads, parking areas and yards;
- c. Landscaping or planting of vegetation; and
- d. Other techniques, as necessary.

[Rule 62-296.320(4)(c)2., F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the air compliance section of this office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/893-3333
Fax: 407/897-5963

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Compliance Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9099
Fax: 404/562-9095

11. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year on or before March 1 of the following year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.]

12. Annual Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit using DEP Form No. 62-213.900(7), F.A.C. Such statements shall be accompanied by a certification in accordance with Rule 62-213.420(4), F.A.C. Such statements shall be submitted (postmarked) to the air compliance section of this office and EPA:

a. Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement; and

b. Within 60 days after submittal of written agreement for transfer of responsibility as required pursuant to 40 CFR 70.7(d)(1)(iv), adopted and incorporated by reference at Rule 62-204.800, F.A.C., or within 60 days after permanent shutdown of a facility permitted under this chapter; provided that, in either such case, the reporting period shall be the portion of the calendar year the permit was effective up to the date of transfer of responsibility or permanent facility shutdown, as appropriate.

[Rule 62-213.440(3)(a)2., F.A.C.]

13. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.

[Rules 62-213.205 and 62-213.900(1), F.A.C.]

14. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

15. Annual Emissions Fee. A completed DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be submitted by the responsible official with the annual emissions fee.

[Rule 62-213.205(1)(k), F.A.C.]

16. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).

[Rule 62-4.090(1), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

<u>E.U. ID No.</u>	<u>Brief Description</u>
001	Cabinet Manufacturing

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

Woodworking operations 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 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 operate 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 are 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.

The following conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emissions unit is permitted to operate continuously.
[Rules 62-4.160(2) and 62-210.200, (PTE), F.A.C., and Construction Permit 0830137-001-AC]

Emission Limitations and Standards

A2. Visible emissions from the paint booths shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

A3. Volatile Organic Compound: The total VOC and HAP emission rate shall not exceed 249 tons per consecutive twelve months.

[Rule 62-210.200 – (PTE), F.A.C., Construction Permit 0830137-001-AC, issued August 6, 1999]

Test Methods and Procedures

A4. Each baghouse emission point must be compliance tested for visible emissions in accordance with DEP Method 9 at least 180 days prior to the permit expiration date. The test shall be conducted for thirty minutes.

[Rules 62-297.401(9)(c), 62-297.310(7)(a)4.a., and 62-297.310(4)(a)2., F.A.C.]

A5. The provisions of EPA Method 9 (40CFR), Appendix A) are adopted by reference with the following exceptions:

a. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

b. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

A6. 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 air compliance section of this office. 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.]

A7. 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.]

A8. Reports of the required test report shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.
[Rules 62-297.310(8), F.A.C.]

Recordkeeping

A9. In order to demonstrate compliance with specific condition A3, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the month, the total VOC emissions for the month and the total VOC emissions for the last 12 consecutive months.

A10. Compliance with the VOC emission limit shall be determined through the use of a mass balance of the organic chemicals purchased and reclaimed. The difference will be assumed to be emissions to the ambient air.
[Construction Permit 0830137-001-AC, issued August 6, 1999]

A11. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be kept at the facility for at least five years and made available to the Department upon request.

Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings".
[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

A12. This emission unit is subject to the following requirements from Title 40 of the Code of Federal Regulations Part 60 (see attached Appendix B):

National Emission Standards for Wood Furniture Manufacturing Operations

40 CFR 63.800	<u>Applicability</u>	Appendix B, page 1
40 CFR 60.802	<u>Emission Limits</u>	Appendix B, page 1
40 CFR 60.803	<u>Work Practice Standards</u>	Appendix B, page 1
40 CFR 60.804	<u>Compliance Procedures and Monitoring Requirements</u>	Appendix B, page 5
40 CFR 60.805	<u>Performance Test Methods</u>	Appendix B, page 6
40 CFR 60.806	<u>Record keeping Requirements</u>	Appendix B, page 7
40 CFR 60.807	<u>Reporting Requirements</u>	Appendix B, page 8

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Abbreviations and Acronyms:

°F:	Degrees Fahrenheit
BACT:	Best Available Control Technology
CFR:	Code of Federal Regulations
DEP:	State of Florida, Department of Environmental Protection
DARM:	Division of Air Resource Management
EPA:	United States Environmental Protection Agency
F.A.C.:	Florida Administrative Code
F.S.:	Florida Statute
ISO:	International Standards Organization
LAT:	Latitude
LONG:	Longitude
MMBtu:	million British thermal units
MW:	Megawatt
ORIS:	Office of Regulatory Information Systems
SOA:	Specific Operating Agreement
UTM:	Universal Transverse Mercator

Citations:

The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.

Code of Federal Regulations:

Example: [40 CFR 60.334]

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

Florida Administrative Code (F.A.C.) Rules:

Example: [Rule 62-213, F.A.C.]

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

ISO: International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

Identification Numbers:

Facility Identification (ID) Number:

Example: Facility ID No.: 1050221

Where: 105 = 3-digit number code identifying the facility is located
in Polk County
0221 = 4-digit number assigned by state database.

Permit Numbers:

Example: 1050221-002-AV, or
1050221-001-AC

Where: AC = Air Construction Permit
AV = Air Operation Permit (Title V Source)
105 = 3-digit number code identifying the facility is
located in Polk County
0221 = 4-digit number assigned by permit tracking
database
001 or 002 = 3-digit sequential project number assigned by
permit tracking database

Example: PSD-FL-185
PA95-01
AC53-208321

Where: PSD = Prevention of Significant Deterioration Permit
PA = Power Plant Siting Act Permit
AC = old Air Construction Permit numbering

APPENDIX B

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(l)(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)]

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:

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

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.

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;

(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.

(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).

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.
- (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.

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.

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 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).

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)]

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(l)(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.)

Appendix H-1, Permit History/ID Number Changes

Merillat Corporation
Cabinet Manufacturing Facility

FINAL Permit No.: 0830137-002-AV
Facility ID No.: 0830137

Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit Number</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
-001	Cabinet Manufacturing	0830137-001-AC	8/6/99	7/31/04		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: N/A

To: Facility ID No.: N/A

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
 - 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
- {Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Merillat Corporation

Cabinet Manufacturing Facility

FINAL Permit No.: 0830137-002-AV

Facility I.D. No.: 0830137

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Woodworking Operations