Merillat.

AV 05
Fee $0

RECEIVED
DEC 19 2005
Central Dist. - DEP

Federal Express

Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

December 15, 2005

Attention: L.T. Kozlov, P.E.
Program Administrator

Re: Title V Permit Renewal
Facility Identification Number 0830137-002-AV

0830137-005-AV

Dear Mr. Kozlov:

Enclosed, please find one (1) copy of the Title V Permit Renewal Application for Merillat LP-Ocala Plant.

Please feel free to contact me with any questions. My number is 352-291-4622

Sincerely,

Donna R Tackett

Donna R. Tackett
Environmental, Health & Safety Coordinator

MALCOLM PIRNIE

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DEC 19 2005
Central Dist. - DEP

TITLE V PERMIT RENEWAL APPLICATION

MERILLAT LP
OCALA PLANT

Merillat.

DECEMBER 2005

Prepared by:

MALCOLM PIRNIE, INC.
701 Town Center Drive, Suite 600
Newport News, Virginia 23606

2767-029

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LIST OF APPENDICES

INTRODUCTION

Merillat LP (Merillat), a division of Merillat Industries, LLC and owned by the MASCO Corporation, currently operates a wood cabinet manufacturing facility in Ocala, Florida. The operations at the facility include woodworking and finishing operations for the manufacturing of kitchen and bath cabinets. The Merillat Ocala Plant currently operates under air permits issued by the Florida Department of Environmental Protection (DEP). A permit for the initial construction of the facility was issued by the DEP on August 6, 1999. The initial construction consisted of the installation of various woodworking equipment and three finishing lines (Lines 1-3). Subsequently, a permit authorizing construction of a new finishing line (Line 4) was issued by the DEP (Air Permit No. 0830137-003-AC) on July 5, 2005. Additionally, Merillat is subject to Title V permitting requirements as a major source of air pollutant emissions based on potential emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). A Title V Air Operation Permit (Permit No. 0830137-002-AV) was issued to the facility by DEP in 2001 with a permit expiration date of August 28, 2006. Merillat is required to submit a permit application for renewal of the Title V permit at least six months prior to the permit expiration date. To address this requirement for Title V permit renewal and to incorporate conditions relative to the new finishing line (Line 4), Merillat is submitting this Title V permit application.

This Title V permit application has been prepared in accordance with guidelines established by the DEP. The application contains details pertaining to manufacturing operations and air pollutant emissions associated with the Merillat Ocala Plant and includes a completed DEP air permit application form. The items listed in the table below are included in this permit application.

Item	Section
Introduction	1
Identification of Applicable Requirements	2
DEP Form No. 62-210.900(1) Application for Air Permit – Long Form	3
Process Description and Emissions Calculations	Appendix A
Compliance Report and Certification	Appendix B

MALCOLM PIRNIE

IDENTIFICATION OF APPLICABLE REQUIREMENTS

The Merillat Ocala Plant is subject to various air quality regulatory requirements. These requirements include both state and federal air quality emissions standards and regulations. The applicable requirements relative to the Merillat Ocala Plant are identified in the table presented below. Applicable state rules are from Chapter 62 of the Florida Administrative Code (F.A.C.). The list of applicable requirements shown below is not intended to be a comprehensive summary of all applicable air quality requirements (i.e., it does not include general regulations and standards that apply to all regulated facilities), but rather identifies the requirements that are substantive or have specific applicability to the Merillat facility.

APPLICABLE AIR QUALITY REQUIREMENTS
Merillat Corporation – Ocala, Florida

Applicable Regulation	Summary of Requirements
40 CFR 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations	Volatile hazardous air pollutant (VHAP) emissions limits and/or use of compliant materials relative to finishing materials, adhesives, and cleaning materials. Implementation of work practice standards.
Chapter 62-210.300 (1), F.A.C. - Air Construction Permits	Requirement to obtain an air construction permit prior to construction or modification of non-exempt facilities and emissions units. Compliance with emissions limitations and other permit conditions is required notwithstanding permit expiration date.
Chapter 62-210.300 (2), F.A.C. - Air Operation Permits	Requirement to obtain air operation permits (Title V facilities are subject to operating permit provisions under 62-213).
Chapter 62-212.300, F.A.C. - General Preconstruction Review Requirements	Air construction permits must be obtained for approval to construct or modify facilities and emissions units subject to permitting requirements. Emissions quantities and related information and other information necessary for DEP evaluation is to be provided in permit application submittals.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Requirements including permit application submittals for initial, renewal, and revisions of operating permits, payment of annual fees, and permit review relative to the operating permit program for major sources (Title V sources).
Chapter 62-296.712, F.A.C. - Miscellaneous Manufacturing Process Operations	For miscellaneous manufacturing process operations, particulate matter emissions limited to 0.03 gr/dscf and any visible emissions limited to 5 percent opacity.
Chapter 62-297.620, F.A.C. - Exceptions and Approval of Alternate Procedures and Requirements	Alternative standard of 5 percent opacity for units equipped with a baghouse (in lieu of stack testing to demonstrate compliance with the emissions limitation under Chapter 62-296.712, F.A.C.).

MALCOLM PIRNIE

DEP AIR PERMIT APPLICATION FORM

A completed DEP Application for Air Permit – Long Form No. 62-210.900(1) is presented in this section for the Merillat Ocala Plant. This application covers Merillat's request for renewal of the Title V operating permit for the Ocala facility.

Department of
Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Merillat LP	
2. Site Name: Merillat Ocala Plant	
3. Facility Identification Number: 0830137	
4. Facility Location... Street Address or Other Locator: 1300 S. W. 38th Avenue City: Ocala County: Marion Zip Code: 34474	
5. Relocatable Facility? ☐ Yes ☑ No	6. Existing Title V Permitted Facility? ☑ Yes ☐ No

Application Contact

1. Application Contact Name: Donna Tackett, Environmental, Health and Safety Coordinator
2. Application Contact Mailing Address... Organization/Firm: Merillat LP Street Address: 1300 S. W. 38th Avenue City: Ocala State: FL Zip Code: 34474
3. Application Contact Telephone Numbers... Telephone: (352) 291-4622 Fax: (352) 291-4603
4. Application Contact Email Address: DTackett@Merillat.com

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

☐ Air construction permit.

Air Operation Permit

☐ Initial Title V air operation permit.

☑ Title V air operation permit revision.

☑ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

The purpose of this application is for the renewal of Merillat's Title V permit which expires on August 30, 2006, and for a Title V permit revision to incorporate conditions relative to a new wood cabinet finishing line (Line 4 - Emissions Unit ID 002) in accordance with Air Permit No. 0830137-003-AC issued on July 5, 2005.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Wood Cabinet Finishing Lines 1, 2, and 3.	N/A	N/A
002	Wood Cabinet Finishing Line 4.	N/A	N/A
003	Woodworking Equipment.	N/A	N/A

Application Processing Fee

Check one: ☐ Attached - Amount: _____ ☑ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: ( ) - Fax: ( ) -

4. Owner/Authorized Representative Email Address:

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

   _____ _____
   Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Chadwick Miller

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   [✓] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   [ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   [ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   [ ] The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: Merillat LP
   Street Address: 1300 S. W. 38th Avenue
   City: Ocala State: FL Zip Code: 34474

4. Application Responsible Official Telephone Numbers...
   Telephone: (352) 291-4610 Fax: (352) 291-4601

5. Application Responsible Official Email Address: CMiller@merillat.com

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature 12/15/05 Date

Professional Engineer Certification

1. Professional Engineer Name: David Cibik
   Registration Number: 55467
2. Professional Engineer Mailing Address...
   Organization/Firm: Malcolm Pirnie, Inc.
   Street Address: 1300 East 8th Avenue, Suite F100
   City: Tampa State: FL Zip Code: 33605
3. Professional Engineer Telephone Numbers...
   Telephone: (813) 248-6900 Fax: (813) 248-8085
4. Professional Engineer Email Address: dcibik@pirnie.com
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☐, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☑, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 12/14/05
Date

(seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) North (km)		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 29° 10' 30 Longitude (DD/MM/SS) 82° 11' 15	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 24	6. Facility SIC(s): 2434
7. Facility Comment : For additional information regarding the facility, see process description in Appendix A.			

Facility Contact

1. Facility Contact Name: Donna Tackett, Environmental, Health and Safety Coordinator
2. Facility Contact Mailing Address... Organization/Firm: Merillat LP Street Address: 1300 S. W. 38th Avenue City: Ocala State: FL Zip Code: 34474
3. Facility Contact Telephone Numbers: Telephone: (352) 291-4622 Fax: (352) 291-4603
4. Facility Contact Email Address:

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. ☑ Title V Source	
4. ☑ Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. ☑ Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☐ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ☑ One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	
The facility is a major source of VOC emissions based on potential VOC emissions greater than 100 tons/year and a major source of HAP emissions based on potential HAP emissions above the 10/25 tons per year thresholds.	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
VOC	A	Y
HAPS	A	N
PM	B	N
PM10	B	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
VOC	N	001		249	ESCPSD
VOC	N	002		166	ESCPSD

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

The emissions caps listed above reflect a VOC emissions cap of 249 tons/year for Wood Cabinet Finishing Lines 1-3 (Emissions Unit ID No. 001) and an emissions cap of 166 tons/year for Wood Cabinet Finishing Line 4 (Emissions Unit ID No. 002).

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____

Note: A waiver is requested on the basis that the facility plot plan has not been altered since initial construction.

2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☑ Attached, Document ID: Figures 1,2 in Appendix A ☐ Previously Submitted, Date:_____

3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:_____ ☐ Previously Submitted, Date:_____

Note: This is considered not applicable since emissions of unconfined particulate matter are not anticipated and activities such as land clearing, building demolition, and vehicle traffic on unpaved roads are not expected to occur.

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:_____ ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification:
   ☐ Attached, Document ID:_____
3. Rule Applicability Analysis:
   ☐ Attached, Document ID:_____
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:_____ ☐ Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   ☐ Attached, Document ID:_____ ☑ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   ☑ Attached, Document ID: see Section 2.0 of this Permit Application
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   ☑ Attached, Document ID: see Appendix B of this Permit Application
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:_____
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   ☑ Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:_____ ☑ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☑ Attached, Document ID: See note below: ☐ Not Applicable

Note: the requested changes to the current Title V permit relate to incorporating permit conditions for Wood Cabinet Finishing Line 4 (Emissions Unit ID No. 002) in accordance with Air Construction Permit No. 0830137-003-AC, dated July 5, 2005. The specific conditions to incorporate in the Title V permit from Air Permit No. 0830137-003-AC are as follows:

- Condition 6.a.,b. Emissions Standards. VOC/HAP emissions limit of 249 tons/yr for Finishing Lines 1-3 and VOC/HAP emissions limit of 166 tons/yr for Finishing Line 4.
- Condition 9.a.-e. Monthly VOC Log. Demonstrate compliance with the VOC/HAP emissions limits by allocating emissions among the lines based on cabinet production.

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION
Section [1] of [3]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☑ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☑ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

This unit addresses three wood cabinet finishing lines (Lines 1, 2, and 3) and associated off-line operations in which various toners, stains, sealers, top-coatings, colors, glazes, and other specialty finishes are applied to wood components in several application booths. Curing ovens and flash and wipe areas are also included as part of the finishing operations. See Appendix A for more detailed information.

3. Emissions Unit Identification Number: 001

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	N/A	N/A	24	☐ Yes ☑ No

9. Package Unit:
Manufacturer: N/A Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

N/A

2. Control Device or Method Code(s):

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: approximately 2,600 cabinets/day	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment:	

The facility is expected to operate on a maximum operating schedule of 16 hours/day, 5 days/week, 250 days/year, 4,000 hours/year. However, periods of increased consumer demand for products may require extended periods of operation on a temporary basis.

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Application of various finishing materials and glue/adhesives to wood cabinet components (Wood furniture surface coating operations).		
2. Source Classification Code (SCC): 4-02-01-901	3. SCC Units: Tons solvent in coatings	
4. Maximum Hourly Rate: see below	5. Maximum Annual Rate: see below	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: For above items 4. and 5., maximum hourly and annual rates will correspond to the amount of VOCs applied as contained in the finishing materials and glues/adhesives (if any). The maximum estimated annual VOC usage (emission) rate is 249 tons/yr.		

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC, HAPS	N/A	N/A	EL

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC, HAPS	2. Total Percent Efficiency of Control: 0.0 %
3. Potential Emissions: 193 lb/hour*; 249 tons/year * This value reflects estimated potential hourly emissions calculated on a monthly average basis. Due to variability in finishing materials applied and VOC/HAP content, the hourly emissions rate could potentially be higher for an individual hour.	4. Synthetically Limited? ☑ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): N/A	
6. Emission Factor: N/A Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions: See Appendix A for detailed emission calculations.	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE, OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.8 lb VHAP/lb solids average across all coatings and 0.2 lb VHAP/lb solids for contact adhesives to comply with 40 CFR 63, Subpart JJ (NESHAP requirements).	4. Equivalent Allowable Emissions: 249 tons VOC/HAP per year
5. Method of Compliance: Maintain records of cabinet production, material usage information, and VOC/HAP content. The facility has implemented a material tracking system (REGMET software) for this purpose.	
6. Allowable Emissions Comment (Description of Operating Method): The allowable VHAP emissions limitations listed above are based on 40 CFR Part 63, Subpart JJ requirements.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Note: this section is not applicable

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Note: this section is not applicable

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Complete if this emissions unit is or would be subject to continuous monitoring.

Note: this section is not applicable

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☑ Attached, Document ID: see Figures 1,2 in Appendix A ☐ Previously Submitted, Date __

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   Not applicable
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   Not applicable
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☑ Not Applicable (construction application) **Note: excess emissions are not anticipated during startup/shutdown of the equipment associated with this emissions unit.**

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☑ Not Applicable **Note: the facility has prepared and maintains a work practice implementation plan as required by 40 CFR 63, Subpart JJ (NESHAP requirements).**

5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☑ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION
Section [2] of [3]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☑ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☑ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

This unit addresses a single wood cabinet finishing line (Line 4) and associated off-line operations in which various toners, stains, sealers, top-coatings, colors, glazes, and other specialty finishes are applied to wood components in several application booths. Curing ovens and flash and wipe areas are also included as part of the finishing operations. See Appendix A for more detailed information.

3. Emissions Unit Identification Number: 002

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	N/A	N/A	24	☐ Yes ☑ No

9. Package Unit:
Manufacturer: N/A Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

N/A

2. Control Device or Method Code(s):

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: approximately 1800 cabinets/day	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr Tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year

6. Operating Capacity/Schedule Comment:

The facility is expected to operate on a maximum operating schedule of 16 hours/day, 5 days/week, 250 days/year, 4,000 hours/year. However, periods of increased consumer demand for products may require extended periods of operation on a temporary basis.

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: See flow diagram (Figures 1,2) in Appendix A	2. Emission Point Type Code: 3
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Finishing materials are primarily applied in spray booths. Fumes from the spray booths, flash areas, and curing ovens are vented to the atmosphere via a series of exhaust fans and exhaust stacks. Fumes from the application of glues/adhesives are vented through building vents.	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A	

5. Discharge Type Code: V	6. Stack Height: 35 feet	7. Exit Diameter: 1.75 feet
8. Exit Temperature: Ambient for application booths/areas and approximately 150°F for curing ovens.	9. Actual Volumetric Flow Rate: Approximately 6,000 – 8,000 cfm per booth and approximately 1,000 – 3,000 cfm per curing oven.	10. Water Vapor: %.

11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)
15. Emission Point Comment:	

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Application of various finishing materials and glue/adhesives to wood cabinet components (Wood furniture surface coating operations).		
2. Source Classification Code (SCC): 4-02-01-901	3. SCC Units: Tons solvent in coatings	
4. Maximum Hourly Rate: see below	5. Maximum Annual Rate: see below	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment: For above items 4. and 5., maximum hourly and annual rates will correspond to the amount of VOCs applied as contained in the finishing materials and glues/adhesives (if any). The maximum estimated annual VOC usage (emission) rate is 166 tons/yr.		

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of __

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC, HAPS	N/A	N/A	EL

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC, HAPS	2. Total Percent Efficiency of Control: 0.0 %
3. Potential Emissions: 134 lb/hour*; 166 tons/year * This value reflects estimated potential hourly emissions calculated on a monthly average basis. Due to variability in finishing materials applied and VOC/HAP content, the hourly emission rate could potentially be higher for an individual hour.	4. Synthetically Limited? ☑ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): N/A	
6. Emission Factor: N/A Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions: See Appendix A for detailed emission calculations.	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE, OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.8 lb VHAP/lb solids average across all coatings and 0.2 lb VHAP/lb solids for contact adhesives to comply with 40 CFR 63, Subpart JJ (NESHAP requirements).	4. Equivalent Allowable Emissions: 166 tons VOC/HAP per year
5. Method of Compliance: Maintain records of cabinet production, material usage information, and VOC/HAP content. The facility has implemented a material tracking system (REGMET software) for this purpose.	
6. Allowable Emissions Comment (Description of Operating Method): The allowable VHAP emissions limitations listed above are based on 40 CFR Part 63, Subpart JJ requirements.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Note: this section is not applicable

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Note: this section is not applicable

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Complete if this emissions unit is or would be subject to continuous monitoring.

Note: this section is not applicable

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☑ Attached, Document ID: see Figures 1,2 in Appendix A ☐ Previously Submitted, Date __

4. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   Not applicable
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

5. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   Not applicable
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☑ Not Applicable (construction application) **Note: excess emissions are not anticipated during startup/shutdown of the equipment associated with this emissions unit.**

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☑ Not Applicable **Note: the facility has prepared and maintains a work practice implementation plan as required by 40 CFR 63, Subpart JJ (NESHAP requirements).**

6. Compliance Demonstration Reports/Records

☐ Attached, Document ID: _____

Test Date(s)/Pollutant(s) Tested: _____

_____

☐ Previously Submitted, Date: _____

Test Date(s)/Pollutant(s) Tested: _____

_____

☐ To be Submitted, Date (if known): _____

Test Date(s)/Pollutant(s) Tested: _____

_____

☑ Not Applicable

Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute

☐ Attached, Document ID: _____ ☑ Not Applicable

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements ☐ Attached, Document ID: see information below: Applicable requirements specific to Emissions Unit 002: ➢ 40 CFR 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations.
2. Compliance Assurance Monitoring ☐ Attached, Document ID: _____ ☑ Not Applicable
3. Alternative Methods of Operation ☐ Attached, Document ID: _____ ☑ Not Applicable
4. Alternative Modes of Operation (Emissions Trading) ☐ Attached, Document ID: _____ ☑ Not Applicable

5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:_
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☑ Not Applicable

Additional Requirements Comment

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

☑ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

☐ The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

☐ This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

☑ This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

☐ This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Miscellaneous woodworking equipment including saws, sanding and brushing machines, and other woodworking machinery.

3. Emissions Unit Identification Number: 003

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	N/A	N/A	24	☐ Yes ☑ No

9. Package Unit:
Manufacturer: N/A Model Number: N/A

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

Baghouse (fabric filter) dust collection systems.

2. Control Device or Method Code(s): 018

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:	
2. Maximum Production Rate: approximately 4,400 cabinets/day	
3. Maximum Heat Input Rate: million Btu/hr	
4. Maximum Incineration Rate: pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment:	

The facility is expected to operate on a 16 hours/day, 5 days/week, 250 days/year, 4,000 hours/year maximum operating schedule. However, periods of increased consumer demand for products may require extended periods of operation on a temporary basis.

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: See flow diagram (Figure 1) in Appendix A.	2. Emission Point Type Code: 3

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:

Emissions from the woodworking operations are vented to common baghouse dust collection systems. There are three baghouse systems with a single exhaust stack for each baghouse. Under normal operating conditions, exhaust air from the baghouse dust collectors is returned to the manufacturing building and is not vented to the atmosphere via the exhaust stacks.

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:
Not applicable

5. Discharge Type Code: V	6. Stack Height: 50 feet	7. Exit Diameter: 5 feet
8. Exit Temperature: Ambient	9. Actual Volumetric Flow Rate: ~ 80,000 acfm	10. Water Vapor: %

11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)

15. Emission Point Comment:

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: PM, PM10	2. Total Percent Efficiency of Control: 99 – 99.9% estimated
3. Potential Emissions: 1.4 lb/hour · 2.2 tons/year	4. Synthetically Limited? ☑ Yes ☐ No
5. Range of Estimated Fugitive Emissions (as applicable): N/A	
6. Emission Factor: Reference: N/A (process knowledge/material balance basis)	7. Emissions Method Code: 2
8. Calculation of Emissions: See Appendix A for detailed emission calculations.	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **N/A – see visible emissions information below in Section G.**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: ☑ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Initial visible emissions evaluation (VEE) conducted after start-up in accordance with EPA Method 9. Subsequent VEE compliance demonstrations required once per permit term.	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: ☐ Rule ☐ Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Note: this section is not applicable

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Complete if this emissions unit is or would be subject to continuous monitoring.

Note: this section is not applicable

Continuous Monitoring System: Continuous Monitor 1 of 1

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: ☐ Rule ☐ Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☑ Attached, Document ID: see Figure 1 in Appendix A ☐ Previously Submitted, Date ____

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   Not applicable
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: See information below: ☐ Previously Submitted, Date

   Control Equipment description: Baghouse (fabric filter) – control device code 018.
   Baghouse manufacturer: Waltz-Holtz
   Model number: DustStar 12-716-11066

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☑ Not Applicable (construction application) **Note: excess emissions are not anticipated during startup/shutdown of the equipment associated with this emissions unit. Woodworking equipment will not be operated if the baghouse dust collection system is shutdown or malfunctioning.**

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID: _____ ☐ Previously Submitted, Date _____
   ☑ Not Applicable

6. Compliance Demonstration Reports/Records

☐ Attached, Document ID: _____

Test Date(s)/Pollutant(s) Tested: _____

_____

☑ Previously Submitted, Date: 11/29/2000

Test Date(s)/Pollutant(s) Tested: Method 9 Test Report (PM/Opacity)

_____

☐ To be Submitted, Date (if known): _____

Test Date(s)/Pollutant(s) Tested: _____

_____

☐ Not Applicable

Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute

☐ Attached, Document ID: _____ ☑ Not Applicable

EMISSIONS UNIT INFORMATION
Section [3] of [3]

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) ☐ Attached, Document ID: _____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements ☐ Attached, Document ID: see information below: Applicable requirements specific to Emissions Unit 003: ➢ 62-296.712(2) – PM emission limitations for Miscellaneous Manufacturing Process Operations. Note that 62-297.620(4) is used to satisfy emissions monitoring requirements in lieu of this provision. ➢ 62-297.620(4) – Exceptions and Approvals of Alternate Procedures and Requirements (applicable to PM emission units with baghouses to waive otherwise applicable PM compliance test requirements by specifying 5% opacity standard).
2. Compliance Assurance Monitoring ☐ Attached, Document ID: _____ ☑ Not Applicable Note: CAM requirements do not apply based on pre-control device particulate matter emissions of less than 100 tons/year. See emissions calculations in Appendix A of this Permit Application.
3. Alternative Methods of Operation ☐ Attached, Document ID: _____ ☑ Not Applicable
4. Alternative Modes of Operation (Emissions Trading) ☐ Attached, Document ID: _____ ☑ Not Applicable

5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:_
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☑ Not Applicable

Additional Requirements Comment

APPENDIX A

Process Description & Emission Calculations

MALCOLM PIRNIE

PROCESS DESCRIPTION & EMISSIONS CALCULATIONS

The wood cabinet manufacturing facility includes two primary processing areas: woodworking and finishing. A process block flow diagram for the facility operations is shown in Figure 1. A more detailed process flow diagram for the manufacturing operations is presented as Figure 2.

PROCESS DESCRIPTION

The woodworking operations consist of machinery used to manufacture wood cabinet and frame components from previously milled wood and sanding machines for final preparation of previously assembled components prior to finishing. The woodworking machinery includes equipment such as saws, sanding machines, borers, routers, and shaping and carving machines. After the machining operations, the wood parts are glued to form panels, frames, and doors in a component assembly process. The wood parts are then exposed to a variety of sanding operations prior to the application of finishing materials. The initial woodworking operations relative to machining operations and component assembly may not be necessary as a majority of the wood cabinet components (doors and frames) are manufactured at other facilities and then sent to the Ocala Plant for finishing. A wood dust collection system is employed for removing dust and chips from the processing operations described above. The dust collection system configuration consists of rigid ductwork from each dust generating equipment unit connected to common fabric filter baghouses. Exhaust from the baghouses is normally returned to the manufacturing building but can also be vented to the atmosphere via exhaust stacks.

The wood cabinet parts finishing system consists of a series of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. These processes are connected by an overhead conveyor system that continually moves the parts through the application and process steps. The process begins with the cabinet parts, such as doors, drawer fronts, and frames, being hung on an overhead conveyor with the use of specially designed hooks. The first on-line operation is a wiping or brushing process to clean the product prior to the first coating step. This operation, depending on line speed, is either manual or automated with the use of a light brush and vacuum system. A small dust collection device is used for dust collection with air returned to the manufacturing building. Next, toner is applied manually by operators using hand held high volume low-pressure (HVLP) spray guns. Toner is applied only to a small percentage of products to achieve certain colors or to harmonize the color of the wood. Also, stain is applied manually by operators again using HVLP spray guns in back-to-back spray booths. Stain is applied to approximately two-thirds of the product finished as required to change the color of the wood. The stained product proceeds to a wiping area where the parts are hand wiped to achieve the desired consistent color. After wiping, the stained parts enter a low temperature oven operated in the range of 150 degrees Fahrenheit to thoroughly dry the stain.

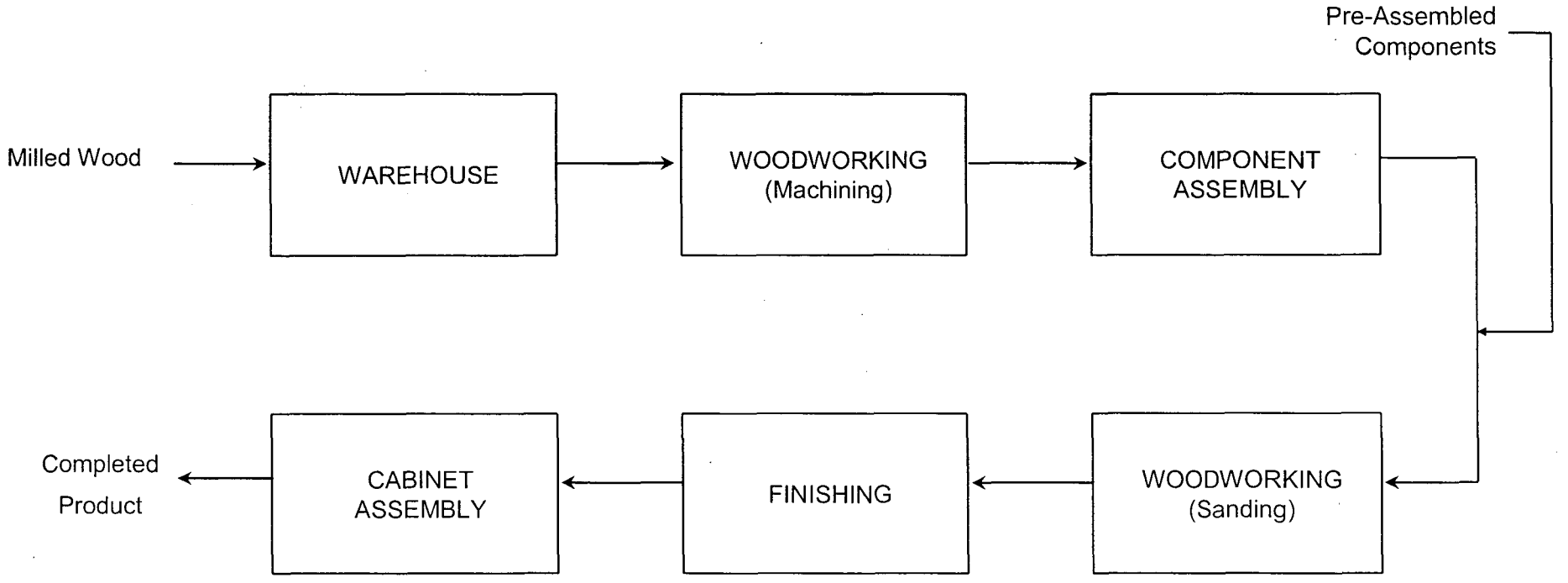
A clear coat sealer is then applied manually by operators using HVLP or air assisted airless (or equivalent) spray guns in back-to-back spray booths. The clear coat sealer is applied to all products to seal the porosity of the wood. The clear coat sealed parts are allowed to flash in a ventilated flash area and then enter an oven where the clear coat is cured. After a short cool down period, the parts are sent to a sealer sand area for light sanding to remove any raised grain. Here the parts are inspected and readied for the application of the final clear topcoat. The dust generated by the sanding operation is collected by a small dust collection system with the air returned to the finishing room. The parts then enter the last finishing process: the application of the clear topcoat. The topcoat is applied manually by operators using HVLP or air assisted airless (or equivalent) spray guns in back-to-back spray booths. The top-coated

parts are allowed to flash in a ventilated flash area and then enter an oven where the topcoat is cured. The parts are allowed to cool on-line for a short time prior to being moved to the cabinet assembly area where final products are assembled.

Additional off-line spray booths are also used as required for touch-up and repair, special parts/products, or special colors, glazes, and other finishes. There are also off-line ovens, sanding and wiping areas used as needed for touch-up and repair, and specialty products.

EMISSIONS CALCULATIONS

Emission calculations, which provide an estimate of maximum expected emissions for the facility including emissions from finishing and woodworking operations, are presented on the following pages. Tables A-1 and A-2 provide calculations of VOC and HAP emissions for Finishing Lines 1-3 and Finishing Line 4, respectively. Table A-3 provides calculations for particulate matter emissions from woodworking operations.



MALCOLM PIRNIE

Ocala Wood Cabinet Assembly Plant

SIMPLIFIED PROCESS FLOW DIAGRAM

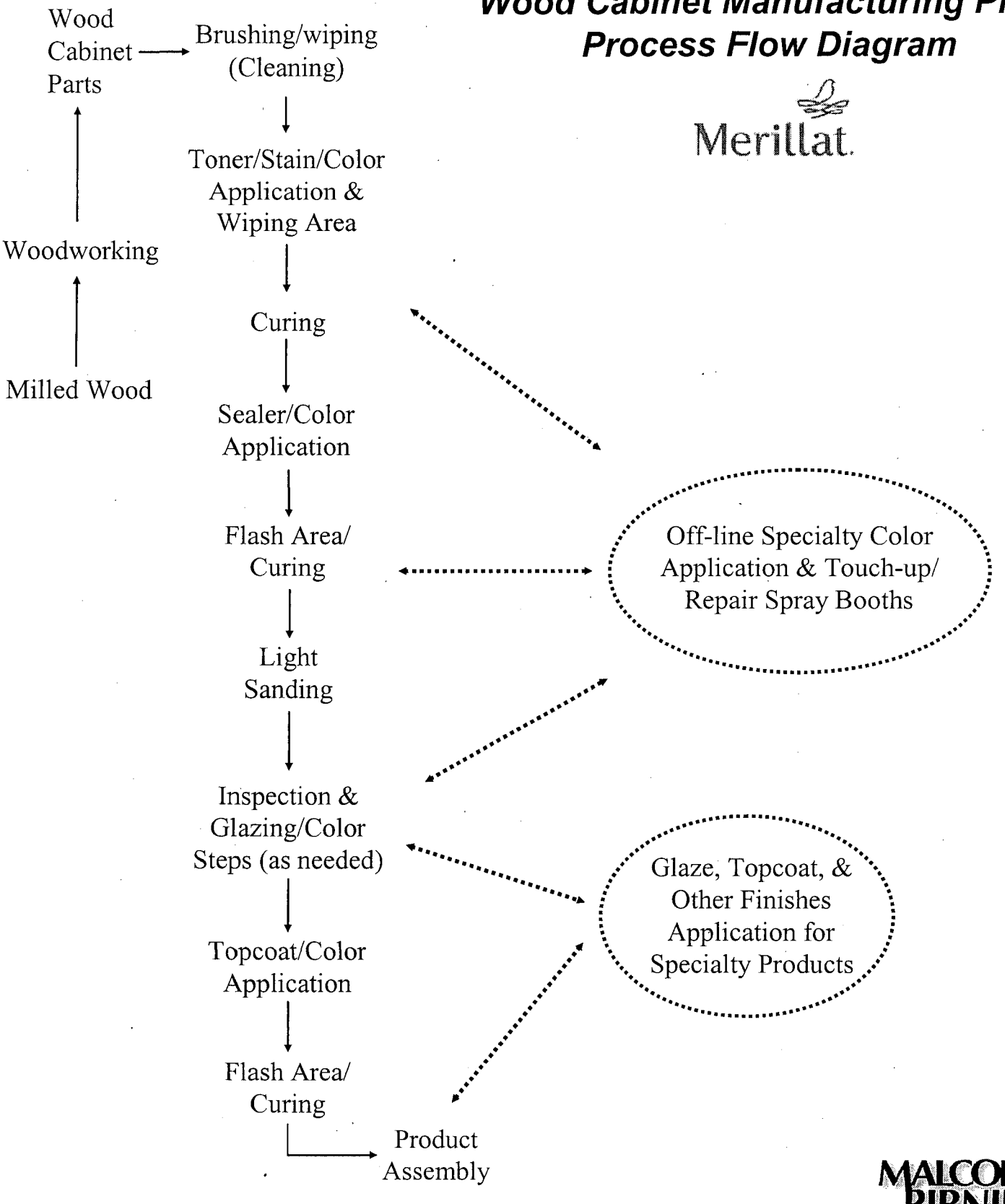
MALCOLM PIRNIE, INC.

FIGURE 1

FIGURE 2

Wood Cabinet Manufacturing Plant Process Flow Diagram

Merillat.



MALCOLM PIRNIE

TABLE A-1
ESTIMATED EMISSIONS FROM FINISHING OPERATIONS (Lines 1-3)
Modified Wood Cabinet Manufacturing Facility - Ocala, Florida

Emissions Unit ID No. 001

Various finishing materials (toners, stains, sealers, topcoatings, glazes, etc.) are applied to wood cabinet parts in Finishing Lines 1-3. The application of these materials generates emissions of VOCs and HAPs from spray booths, flash & wipe areas, and curing ovens. Note that a portion of the wood cabinet components assembled (certain doors and drawer fronts) are not finished.

Estimated Operating Data:

Maximum cabinets to be finished (approximate value)	2600 cabinets/day
VOC usage per cabinet (annual average maximum basis)	0.95 lb/cabinet
HAP usage per cabinet (annual average maximum basis)	0.20 lb/cabinet
Maximum permitted VOC/HAP emissions (annual permit limit)	249 tons/yr

Maximum Expected VOC Emissions:

Hourly emissions = 2600 cab./day x 0.95 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 193.0 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 249 tons/yr (note: this is a permit limitation)

Maximum Expected HAP (total) Emissions:

Hourly emissions = 2600 cab./day x 0.20 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 40.6 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 249 tons/yr (note: this is a permit limitation)

TABLE A-2
ESTIMATED EMISSIONS FROM FINISHING OPERATIONS (Line 4)
Modified Wood Cabinet Manufacturing Facility - Ocala, Florida

Emissions Unit ID No. 002

Various finishing materials (toners, stains, sealers, topcoatings, glazes, etc.) are applied to wood cabinet parts in Finishing Line 4. The application of these materials generates emissions of VOCs and HAPs from spray booths, flash & wipe areas, and curing ovens. Note that a portion of the wood cabinet components assembled (certain doors and drawer fronts) are not finished.

Estimated Operating Data:

Maximum cabinets to be finished (approximate value)	1800 cabinets/day
VOC usage per cabinet (annual average maximum basis)	0.95 lb/cabinet
HAP usage per cabinet (annual average maximum basis)	0.20 lb/cabinet
Maximum permitted VOC/HAP emissions (annual permit limit)	166 tons/yr

Maximum Expected VOC Emissions:

Hourly emissions = 1800 cab./day x 0.95 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 133.6 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 166 tons/yr (note: this is a permit limitation)

Maximum Expected HAP (total) Emissions:

Hourly emissions = 1800 cab./day x 0.20 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 28.1 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 166 tons/yr (note: this is a permit limitation)

TABLE A-3
ESTIMATED EMISSIONS FROM WOODWORKING OPERATIONS
Modified Wood Cabinet Manufacturing Facility - Ocala, Florida

Emission Unit ID No. 003

Woodworking machinery is operated primarily for sawing and sanding of wood cabinet components prior to finishing operations. Note that a majority of the wood cabinets components are manufactured at other facilities and limited woodworking operations occur at the Ocala facility. Emissions of particulate matter from the woodworking operations are controlled by three (3) baghouse dust collector systems operating at an estimated control efficiency of 99 - 99.9 percent. It is important to note that the dust collection systems return exhaust air to the manufacturing building and do not normally exhaust to the atmosphere.

Estimated Operating Data:

Maximum cabinets to be assembled (approximate value)	4400 cabinets/day
Amount of material wasted (annual average maximum basis)	1.0 lb/cabinet
Estimated particulate/dust portion of material wasted	40 percent
Control efficiency of dust collector system	99 - 99.9 percent

Maximum Expected PM Emissions:

Hourly emissions = 4400 cab./day x 1.0 lb/cab x day/16 hr x 0.4 x (1 - 0.99) x 1.25 (max hourly factor)
= 1.4 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 4400 cab./day x 1.0 lb/cab x 250 day/yr x 0.4 x (1 - 0.99) x ton/2000 lb
= 2.2 ton/yr

CAM Applicability - Estimate of Pre-Control Device Emissions

Maximum Estimated Uncontrolled Annual PM Emissions (for each baghouse dust collector):

Annual emissions = 4400 cab./day x 1.0 lb/cab. X 250 day/yr x 0.4 x ton/2000 lb x 1/3 units
= 73.3 ton/yr

Since pre-control device emissions are < 100 tons/yr for each of the three baghouse dust collector systems, CAM requirements are not applicable.

APPENDIX B

Compliance Report & Certification

MALCOLM PIRNIE

COMPLIANCE REPORT & CERTIFICATION

Compliance Report

The Merillat Ocala Plant is operating in compliance with all applicable air quality requirements. For Emissions Unit 003 (woodworking operations), a Method 9 compliance test report dated November 29, 2000 has been submitted to the Florida Department of Environmental Protection. For Emissions Units 001 and 002 (finishing operations), Merillat has developed and maintains a work practice implementation plan in accordance with 40 CFR Subpart 63, Subpart JJ. Also for Emissions Units 001 and 002, a material tracking system (REGMET) has been implemented to quantify and record HAP and VOC usage from the application of finishing materials for demonstrating compliance with applicable emission limitations prescribed by 40 CFR 63, Subpart JJ and the permitted VOC/HAP annual (tons/yr) emissions limits for the finishing lines.

Compliance Certification

Merillat LP proposes to submit periodic compliance certification statements annually to the Florida Department of Environmental Protection (DEP) throughout the Title V permit term for the Merillat Ocala Plant.

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Signature

12/15/05

Date

TABLE A-3
ESTIMATED EMISSIONS FROM WOODWORKING OPERATIONS
Modified Wood Cabinet Manufacturing Facility - Ocala, Florida

Emission Unit ID No. 003

Woodworking machinery is operated primarily for sawing and sanding of wood cabinet components prior to finishing operations. Note that a majority of the wood cabinets components are manufactured at other facilities and limited woodworking operations occur at the Ocala facility. Emissions of particulate matter from the woodworking operations are controlled by three (3) baghouse dust collector systems operating at an estimated control efficiency of 99 - 99.9 percent. It is important to note that the dust collection systems return exhaust air to the manufacturing building and do not normally exhaust to the atmosphere.

Estimated Operating Data:

Maximum cabinets to be assembled (approximate value)	4400 cabinets/day
Amount of material wasted (annual average maximum basis)	1.0 lb/cabinet
Estimated particulate/dust portion of material wasted	40 percent
Control efficiency of dust collector system	99 - 99.9 percent

Maximum Expected PM Emissions:

Hourly emissions = 4400 cab./day x 1.0 lb/cab x day/16 hr x 0.4 x (1 - 0.99) x 1.25 (max hourly factor)
= 1.4 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 4400 cab./day x 1.0 lb/cab x 250 day/yr x 0.4 x (1 - 0.99) x ton/2000 lb
= 2.2 ton/yr

CAM Applicability - Estimate of Pre-Control Device Emissions

Maximum Estimated Uncontrolled Annual PM Emissions (for each baghouse dust collector):

Annual emissions = 4400 cab./day x 1.0 lb/cab. X 250 day/yr x 0.4 x ton/2000 lb x 1/3 units
= 73.3 ton/yr

Since pre-control device emissions are < 100 tons/yr for each of the three baghouse dust collector systems, CAM requirements are not applicable.

MALCOLM PIRNIE

COMPLIANCE REPORT & CERTIFICATION

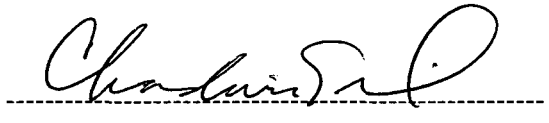
Compliance Report

The Merillat Ocala Plant is operating in compliance with all applicable air quality requirements. For Emissions Unit 003 (woodworking operations), a Method 9 compliance test report dated November 29, 2000 has been submitted to the Florida Department of Environmental Protection. For Emissions Units 001 and 002 (finishing operations), Merillat has developed and maintains a work practice implementation plan in accordance with 40 CFR Subpart 63, Subpart JJ. Also for Emissions Units 001 and 002, a material tracking system (REGMET) has been implemented to quantify and record HAP and VOC usage from the application of finishing materials for demonstrating compliance with applicable emission limitations prescribed by 40 CFR 63, Subpart JJ and the permitted VOC/HAP annual (tons/yr) emissions limits for the finishing lines.

Compliance Certification

Merillat LP proposes to submit periodic compliance certification statements annually to the Florida Department of Environmental Protection (DEP) throughout the Title V permit term for the Merillat Ocala Plant.

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.



Signature

12/15/05

Date

MALCOLM PIRNIE

PROCESS DESCRIPTION & EMISSIONS CALCULATIONS

The wood cabinet manufacturing facility includes two primary processing areas: woodworking and finishing. A process block flow diagram for the facility operations is shown in Figure 1. A more detailed process flow diagram for the manufacturing operations is presented as Figure 2.

PROCESS DESCRIPTION

The woodworking operations consist of machinery used to manufacture wood cabinet and frame components from previously milled wood and sanding machines for final preparation of previously assembled components prior to finishing. The woodworking machinery includes equipment such as saws, sanding machines, borers, routers, and shaping and carving machines. After the machining operations, the wood parts are glued to form panels, frames, and doors in a component assembly process. The wood parts are then exposed to a variety of sanding operations prior to the application of finishing materials. The initial woodworking operations relative to machining operations and component assembly may not be necessary as a majority of the wood cabinet components (doors and frames) are manufactured at other facilities and then sent to the Ocala Plant for finishing. A wood dust collection system is employed for removing dust and chips from the processing operations described above. The dust collection system configuration consists of rigid ductwork from each dust generating equipment unit connected to common fabric filter baghouses. Exhaust from the baghouses is normally returned to the manufacturing building but can also be vented to the atmosphere via exhaust stacks.

The wood cabinet parts finishing system consists of a series of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. These processes are connected by an overhead conveyor system that continually moves the parts through the application and process steps. The process begins with the cabinet parts, such as doors, drawer fronts, and frames, being hung on an overhead conveyor with the use of specially designed hooks. The first on-line operation is a wiping or brushing process to clean the product prior to the first coating step. This operation, depending on line speed, is either manual or automated with the use of a light brush and vacuum system. A small dust collection device is used for dust collection with air returned to the manufacturing building. Next, toner is applied manually by operators using hand held high volume low-pressure (HVLP) spray guns. Toner is applied only to a small percentage of products to achieve certain colors or to harmonize the color of the wood. Also, stain is applied manually by operators again using HVLP spray guns in back-to-back spray booths. Stain is applied to approximately two-thirds of the product finished as required to change the color of the wood. The stained product proceeds to a wiping area where the parts are hand wiped to achieve the desired consistent color. After wiping, the stained parts enter a low temperature oven operated in the range of 150 degrees Fahrenheit to thoroughly dry the stain.

A clear coat sealer is then applied manually by operators using HVLP or air assisted airless (or equivalent) spray guns in back-to-back spray booths. The clear coat sealer is applied to all products to seal the porosity of the wood. The clear coat sealed parts are allowed to flash in a ventilated flash area and then enter an oven where the clear coat is cured. After a short cool down period, the parts are sent to a sealer sand area for light sanding to remove any raised grain. Here the parts are inspected and readied for the application of the final clear topcoat. The dust generated by the sanding operation is collected by a small dust collection system with the air returned to the finishing room. The parts then enter the last finishing process: the application of the clear topcoat. The topcoat is applied manually by operators using HVLP or air assisted airless (or equivalent) spray guns in back-to-back spray booths. The top-coated

parts are allowed to flash in a ventilated flash area and then enter an oven where the topcoat is cured. The parts are allowed to cool on-line for a short time prior to being moved to the cabinet assembly area where final products are assembled.

Additional off-line spray booths are also used as required for touch-up and repair, special parts/products, or special colors, glazes, and other finishes. There are also off-line ovens, sanding and wiping areas used as needed for touch-up and repair, and specialty products.

EMISSIONS CALCULATIONS

Emission calculations, which provide an estimate of maximum expected emissions for the facility including emissions from finishing and woodworking operations, are presented on the following pages. Tables A-1 and A-2 provide calculations of VOC and HAP emissions for Finishing Lines 1-3 and Finishing Line 4, respectively. Table A-3 provides calculations for particulate matter emissions from woodworking operations.

TABLE A-1
ESTIMATED EMISSIONS FROM FINISHING OPERATIONS (Lines 1-3)
Modified Wood Cabinet Manufacturing Facility - Ocala, Florida

Emissions Unit ID No. 001

Various finishing materials (toners, stains, sealers, topcoatings, glazes, etc.) are applied to wood cabinet parts in Finishing Lines 1-3. The application of these materials generates emissions of VOCs and HAPs from spray booths, flash & wipe areas, and curing ovens. Note that a portion of the wood cabinet components assembled (certain doors and drawer fronts) are not finished.

Estimated Operating Data:

Maximum cabinets to be finished (approximate value)	2600 cabinets/day
VOC usage per cabinet (annual average maximum basis)	0.95 lb/cabinet
HAP usage per cabinet (annual average maximum basis)	0.20 lb/cabinet
Maximum permitted VOC/HAP emissions (annual permit limit)	249 tons/yr

Maximum Expected VOC Emissions:

Hourly emissions = 2600 cab./day x 0.95 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 193.0 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 249 tons/yr (note: this is a permit limitation)

Maximum Expected HAP (total) Emissions:

Hourly emissions = 2600 cab./day x 0.20 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 40.6 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 249 tons/yr (note: this is a permit limitation)

TABLE A-2
ESTIMATED EMISSIONS FROM FINISHING OPERATIONS (Line 4)
Modified Wood Cabinet Manufacturing Facility - Ocala, Florida

Emissions Unit ID No. 002

Various finishing materials (toners, stains, sealers, topcoatings, glazes, etc.) are applied to wood cabinet parts in Finishing Line 4. The application of these materials generates emissions of VOCs and HAPs from spray booths, flash & wipe areas, and curing ovens. Note that a portion of the wood cabinet components assembled (certain doors and drawer fronts) are not finished.

Estimated Operating Data:

Maximum cabinets to be finished (approximate value)	1800 cabinets/day
VOC usage per cabinet (annual average maximum basis)	0.95 lb/cabinet
HAP usage per cabinet (annual average maximum basis)	0.20 lb/cabinet
Maximum permitted VOC/HAP emissions (annual permit limit)	166 tons/yr

Maximum Expected VOC Emissions:

Hourly emissions = 1800 cab./day x 0.95 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 133.6 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 166 tons/yr (note: this is a permit limitation)

Maximum Expected HAP (total) Emissions:

Hourly emissions = 1800 cab./day x 0.20 lb/cab x day/16 hr x 1.25 (max hourly factor)
= 28.1 lb/hr
(note: this reflects a monthly average maximum hourly emission rate)

Annual emissions = 166 tons/yr (note: this is a permit limitation)

3. The origin of the purchased equipment costs in the BACT cost evaluations for incineration/oxidation control options is not explained. If Merillat obtained vendor quotes for purchased equipment, these quotes should be provided.

4. Even if control of total VOC emissions is cost prohibitive due to the high air volumes involved in total control, perhaps it would be possible to control at reasonable cost some individual components of the manufacturing process that produce high VOC emissions compared to other components. From the information provided in the application, we simply are not able to tell if control of individual components is technically and economically feasible.

5. On page B-3, the applicant describes why committing to restrictions on the VOC content of finishing materials could adversely affect product quality. This discussion does not provide much in the way of details. Perhaps it would be possible to restrict the VOC content of certain materials such as toners and sealers even if the VOC content of other materials such as topcoats must be more variable.

6. The information cited from EPA's RBLC indicates several other wood products facilities use low VOC coatings for BACT. It is not clear why low VOC coatings are appropriate for these facilities and not for Merillat's Ocala facility. Related to this point, we can not tell if Merillat is proposing to change the formulation of finishing materials currently in use at the facility. If Merillat proposes to use materials with VOC content higher than the VOC content in materials currently used, this change should be explained.

7. On page B-4, the applicant in effect portrays the option of an exhaust gas VOC concentrator as being technically infeasible due to expected high downtime. The applicant states that "information obtained on this equipment suggests" downtime as much as 20 to 30 percent. The applicant should describe the source of the "information obtained" and provide a copy of the information if in writing. We recommend that FDEP give further consideration to a combination of a concentrator and a small regenerative thermal oxidizer (RTO). An RTO operating on a low volume, high concentration gas stream might be able to achieve a destruction efficiency greater than the 95 percent assumed by the applicant for other incineration/oxidation control options.

8. The applicant states on page 1-2 (second page of Section 1.0) that an ambient air quality impact analysis is not included because the only pollutant subject to PSD review is VOC. VOC emissions are not exempt from ambient air quality impact analysis requirements. Rather, the analysis of VOC impacts is typically done in a more qualitative manner than is the impact analysis for other pollutants.