



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

E-CORRESPONDENCE  
CMILLER@MERRILAT.COM

## NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

Mr. Chadwick Miller, Plant Manager  
Merillat Corporation  
1300 S.W. 38<sup>th</sup> Avenue  
Ocala, FL 34474

Re: Title V Air Operation Permit Renewal  
FINAL Permit No.: 0830137-005-AV  
Cabinet Manufacturing Facility

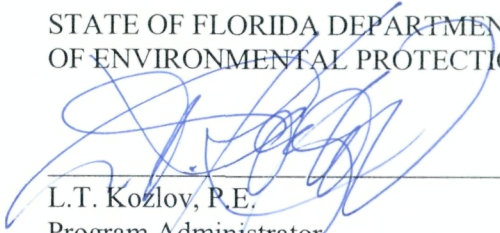
Dear Mr. Miller:

Enclosed is FINAL Permit Number 0830137-005-AV for the operation of the Merillat Corporation Facility, located at 1300 S.W. 38<sup>th</sup> Avenue, Ocala, Marion County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



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

  
LTK/azt

"More Protection, Less Process"

Printed on recycled paper.

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) and all copies were sent by certified mail before the close of business on December 27, 2006 to the person(s) listed:

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

Enclosures  
copy furnished to:

David Cibik ([dcibik@pirnie.com](mailto:dcibik@pirnie.com))

Caroline Shine, FDEP

Al Linero ([alvaro.linero@dep.state.fl.us](mailto:alvaro.linero@dep.state.fl.us))

Barbara Friday, BAR [[Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us)] (for posting with Region 4, USEPA)

Clerk Stamp

Filed, on this date, pursuant to Section 120.52,  
F.S., with the designated Department Clerk,  
receipt of which is hereby acknowledged.

Dina Jones  
(Clerk)

12/27/06  
(Date)

Merillat Corporation  
**Facility ID No.:** 0830137  
Marion County

Title V Air Operation Permit  
**FINAL Permit No.:** 0830137-005-AV

**Permitting Authority and Compliance Authority:**

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

Title V Air Operation Permit  
Merillat Corporation  
Cabinet Manufacturing Facility  
FINAL Permit No.: 0830137-005-AV

TABLE OF CONTENTS

<u>Description</u>	<u>Page Number</u>
Cover Page	i
Table of Contents	ii
Placard Information	1
I. Facility Information	2
Subsections	
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). And Brief Description(s)	
C. Relevant Documents.	
II. Facility-wide Conditions	4
III. Emissions Unit Specific Conditions	7
Subsections	
A. Emission Unit 001 – Cabinet Manufacturing Finishing Lines 1, 2, 3	
B. Emission Unit 002-Cabinet Manufacturing Line 4	
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers	
Appendix B- Title 40 Code of Federal Regulations-Part 63-Subpart JJ	
Appendix H-1, Permit History/ID Number Changes	
Appendix I-1, List of Insignificant Emissions Units and/or Activities	
APPENDIX TV-6, TITLE V CONDITIONS	



# Department of Environmental Protection

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Governor

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3319 Maguire Boulevard, Suite 232  
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Colleen M. Castille  
Secretary

**Permittee:**

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

**FINAL Permit No.:** 0830137-005-AV

**Facility ID No.:** 0830137

**SIC Nos.:** 24,2434

**Project:** Cabinet Manufacturing Facility

Attention: Chadwick Miller, Plant Manager

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

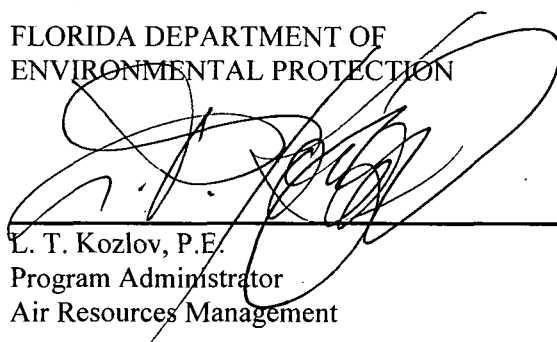
**STATEMENT OF BASIS:** This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown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

**Referenced attachments made a part of this permit:**

Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06)

**Effective Date:** December 26, 2006  
**Renewal Application Due Date:** February 28, 2011  
**Expiration Date:** August 30, 2011

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION



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



LTK/azt

"More Protection, Less Process"

Printed on recycled paper.

## SPECIFIC CONDITIONS

### Section I. Facility Information.

#### Subsection A. Facility Description.

Merillat Corporation produces wooden kitchen and bathroom cabinets.

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

Based on the Title V permit renewal application received December 19, 2005, this facility is a major source of hazardous air pollutants (HAPs).

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

<u>E.U. ID No.</u>	<u>Brief Description</u>
001	Cabinet Manufacturing Finishing Lines 1, 2, 3
002	Cabinet Manufacturing Finishing Line 4

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

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

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

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

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

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

## **SPECIFIC CONDITIONS**

### **Subsection C. Relevant Documents.**

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

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

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

Appendix H-1, Permit History / ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received February 28, 2001

Initial Title V Permit issued September 10, 2001

Construction Permit (non PSD) 4<sup>th</sup> Finishing Line issued July 5, 2005

## SPECIFIC CONDITIONS

### Section II. Facility-wide Conditions.

#### The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297, F.A.C.  
[Rule 62-296.320(4)(b)1., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
  - a) The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:  

RMP Reporting Center  
Post Office Box 1515  
Lanham-Seabrook, MD 20703-1515  
Telephone: 301/429-5018
  - b) The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.  
[40 CFR 68]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

To comply, procedures to minimize pollutant emissions shall include the following:

- a) tightly cover or close all VOC containers when they are not in use,



**SPECIFIC CONDITIONS**

- b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
- c) maintain all piping, valves, fittings, etc. in good operating condition,
- d) prevent excessive air turbulence across exposed VOC's,
- e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.  
[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Maintenance of paved areas as needed;
- b) Regular mowing of grass and care of vegetation;
- c) Limited access to plant property by unnecessary vehicles.

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

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the air compliance section of this office and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Florida Department of Environmental Protection  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803  
Telephone: 407/893-3334; Fax: 407/897-5963

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

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxic Management Division  
Air and EPCRA Enforcement Branch  
Air Enforcement Section  
61 Forsyth Street  
Atlanta, Georgia 30303-8960  
Telephone: 404/562-9155; Fax: 404/562-9163

**SPECIFIC CONDITIONS**

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62.213.420(4), F.A.C.]

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

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

14. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions. [Rules 62-213.205 and 62-213.900(1), F.A.C.]

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

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

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

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

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

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

## **SPECIFIC CONDITIONS**

### **Section III. Emissions Unit(s) and Conditions.**

#### **Subsection A. This section addresses the following emissions units.**

##### **E.U. ID No. Brief Description**

001	Cabinet Manufacturing Finishing Lines 1, 2, 3
002	Cabinet Manufacturing Finishing Lines 4

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

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

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

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

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

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

#### **Essential Potential to Emit (PTE) Parameters**

**A1. Hours of Operation.** The emissions unit is permitted to operate continuously.  
[Rules 62-4.160(2) and 62-210.200, (PTE), F.A.C., and Construction Permit 0830137-003-AC]

#### **Emission Limitations and Standards**

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

### **SPECIFIC CONDITIONS**

**A3. Volatile Organic Compound:** The total VOC and HAP emission rate shall not exceed 249 tons per consecutive twelve months for finishing lines 1, 2 and 3 and 166 tons per consecutive twelve months for finishing line 4.

[Rule 62-210.200 – (PTE), F.A.C., Construction Permit 0830137-003-AC]

#### **Test Methods and Procedures**

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

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

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

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

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

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

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

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

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

**A6.** At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the air compliance section of this office. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.

[Rule 62-297.310(7)(a)9, F.A.C.]

## SPECIFIC CONDITIONS

**A7.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

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

**A8.** Reports of the required test report shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.

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

### Recordkeeping

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

**A10.** Compliance with the VOC emission limit shall be determined through the use of a mass balance of the organic chemicals purchased and reclaimed. The difference will be assumed to be emissions to the ambient air.

[Construction Permit 0830137-003-AC.]

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

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

[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

**SPECIFIC CONDITIONS**

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

**National Emission Standards for Wood Furniture Manufacturing Operations**

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

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

### Abbreviations and Acronyms:

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

### Citations:

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

#### Code of Federal Regulations:

*Example: [40 CFR 60.334]*

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

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

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

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

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

## Identification Numbers:

### Facility Identification (ID) Number:

*Example:* Facility ID No.: 1050221

*Where:*

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

### Permit Numbers:

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

*Where:*

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

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

*Where:*

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



1 of many

## APPENDIX B

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

#### **63.800 Applicability**

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

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

#### **63.802 Emission limits**

1. The permittee shall:

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

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

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

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

#### **63.803 Work practice standards**

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

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

2. **Operator training course.** The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of 40 CFR Part 63 Subpart JJ. All new personnel, those hired after the compliance date of the standard,

Appendix H-1, Permit History/ID Number Changes

Merillat Corporation  
Cabinet Manufacturing Facility

FINAL Permit No.: 0830137-005-AV  
Facility ID No.: 0830137

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Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit Number</u>	<u>Issue Date</u>	<u>Expiration Date</u>
-001	Cabinet Manufacturing	0830137-001-AC	August 6, 1999	July 31, 2004
-001	Cabinet Manufacturing	0830137-002-AV	September 10, 2001	August 30, 2006
A11	Cabinet Manufacturing	0830137-003-AC	July 1, 2005	December 1, 2006
A11	Cabinet Manufacturing	0830137-004-AV	Withdrawn by Tallahassee office	October 14, 2004
A11	Cabinet Manufacturing	0830137-005-AV	December 26, 2006	August 30, 2011

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

Merillat Corporation, L.L.C.

Cabinet Manufacturing Facility

FINAL Permit No.: 0830137-005-AV

Facility I.D. No.: 0830137

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

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

### Brief Description of Emissions Units and/or Activities

#### 1. Woodworking Operations

1 of many

**APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06)**

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4, F.A.C.

1. **Not federally enforceable.** General Prohibition. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, constructed, expanded, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); and, Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable.** Procedures to Obtain Permits and Other Authorizations: Applications.

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except, when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(b) When an application is received without the required fee, the Department shall acknowledge receipt of the application and shall immediately notify the applicant by certified mail that the required fee was not received and advise the applicant of the correct fee. The Department shall take no further action until the correct fee is received. If a fee was received by the Department which is less than the amount required, the Department shall return the fee along with the written notification.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application for the same time duration except for modification under Chapter 62-45, F.A.C.

[Rule 62-4.050, F.A.C.]

## STATEMENT OF BASIS

Boston Whaler, Incorporated  
Boat Manufacturing Facility (Edgewater)  
Facility ID No.: 1270063  
Volusia County

Title V Air Operation Permit Renewal  
PROPOSED Permit Project No.: 1270063-005-AV

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

The subject of this permit is for the renewal of the Title V Air Operation Permit. The company operates a boat manufacturing facility. The facility consists of Building No. 1 (Administration), Building No. 2 (Boat Production), and R&D Prototype Building. The Administration Building has no stacks, the Boat Production Building has twenty-three stacks, and the R&D Prototype Building has two stacks.

The facility is subject to the General Pollutant Emission Limitations, Rule 62-296.320(2), F.A.C., and 40 CFR 60 Subpart VVVV, National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. MACT is not applicable, as there is not any construction or increase in emissions within the application. CAM does not apply, as there are no control devices at the facility.

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

Based on the Title V Air Operation Permit Renewal application received June 29, 2006, this facility is a major source of hazardous air pollutants (HAPs):

## **STATEMENT OF BASIS**

Merillat Corporation LLC  
Cabinet Making Facility  
**Facility ID No.:** 0830137  
Marion County

**FINAL Title V Permit No.:** 0830137-005-AV

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

Based on the initial Title V permit application received May 25, 1999, this facility is a major source of hazardous air pollutants (HAPs). Also included in this permit are miscellaneous insignificant emission units and/or activities.

The permittee may operate wood furniture manufacturing facility that includes woodworking and finishing operations for the manufacturing of kitchen and bath cabinets. Woodworking operations include wood machining, gluing, and sanding. Baghouse systems are to be used to control particulate emissions, provide at least 99% particulate removal efficiency, and exhausted to the atmosphere through a series of rooftop stacks. Finishing operations consist of a series of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. Parts are transferred between process stations by an overhead conveyor system. Toners, stains, clear coat sealers, and clear topcoats are applied to parts as necessary to produce the desired product; however, application is performed manually, by operators in spray booths, using high-volume, low-pressure (HVLP) spray guns. The permittee may operate off-line spray booths for part touch-up or repair, special parts or products, or special colors. A "top shop" side operation produces laminated cabinet tops. This operation includes machining operations, glue application, and a final edge trim step. Particulate emissions from the "top shop" operations are controlled by a dust collection system.

A fourth manufacturing line was permitting by the Tallahassee staff, permit 0830137-003-AC. From that project's technical determination, the additional of the fourth line added another 166 tons of potential VOC/HAP emissions. With the potential VOC/HAP emissions of 415 tons per year, the plant will become a PSD major facility. Subsequent projects must be reviewed for PSD applicability based on the PSD significant emission rates in Table 62-212.400-2 which specifies 40 tons per year for VOC emissions. The applicant concluded that the proposed project is a minor modification to a PSD minor facility.

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