

SWD INTERNAL PERMITTING MEMORANDUM

TO: Pamala Vazquez
District Program Administrator
Southwest District

THRU: Cindy Zhang-Torres, P.E. *CF*
Air Permitting Manager

DATE: July 12, 2011

SUBJECT: Draft/Proposed Title V Air Operation Permit No: 0830137-006-AV
Masco Cabinetry LLC
Ocala Plant

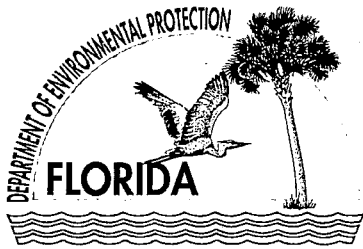
Day 90: September 15, 2011

On June 1, 2011, Masco Cabinetry LLC applied for a Title V Air Operation Permit Renewal for its Ocala Plant.

This facility has been under a long-term shutdown status since October 31, 2008. In accordance with Rule 62-210.300(2)(a)b., F.A.C., the operation permit shall be renewed for a period not to exceed five years from the date of shutdown. Therefore this renewal permit will have an expiration date of October 31, 2013. Other details regarding this renewal are summarized in the Statement of Basis document.

There is an open enforcement case against this facility for late submittal of the Title V permit renewal application.

I recommend issuance of the attached draft/proposed permit package.



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronic Mail – Received Receipt Requested

Mr. Bob Terhune, VP - Operations
Masco Cabinetry LLC
4600 Arrowhead Drive
Ann Arbor, MI 48105

Re: Permit No. 0830137-006-AV
Ocala Plant
Title V Air Operation Permit Renewal

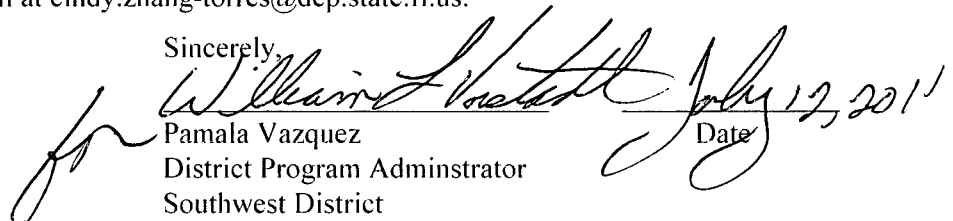
Dear Mr. Terhune:

Enclosed is the draft/proposed permit package to renew the Title V air operation permit for Msaco Cabinetry LLC's Ocala plant. This facility is located in Marion County at 1300 SW 38th Avenue, Ocala, Florida. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, and the primary rule applicability, and the changes since the last Title V renewal.
- The draft/proposed Title V air operation permit renewal, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Title V Air Operation Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the draft/proposed permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address: quendo.ana@epamail.epa.gov.

If you have any questions, please contact the Project Engineer, Cindy Zhang-Torres, P.E., by telephone at (813) 632-7600 ext. 107 or by email at cindy.zhang-torres@dep.state.fl.us.

Sincerely,


Pamala Vazquez
District Program Administrator
Southwest District

Date

Enclosures
PLV/cz/pp

WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

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

Masco Cabinetry LLC
4600 Arrowhead Drive
Ann Arbor, MI 48105

Permit No. 0830137-006-AV
Facility ID No. 0830137
Ocala Plant
Title V Air Operation Permit Renewal
Marion County, Florida

Responsible Official:
Mr. Bob Terhune, VP - Operations

Facility Location: Masco Cabinetry LLC operates the Ocala plant, which is located in Marion County at 1300 SW 38th Avenue, Ocala, Florida.

Project: The purpose of this project is to renew Title V air operation permit No. 0830137-005-AV, for the above referenced facility. Details of the project are provided in the application and the enclosed Statement of Basis.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Department of Environmental Protection's Air Resource Section in the Southwest District is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 13051 N. Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 N. Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

Comments: The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

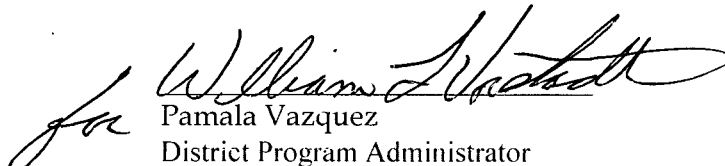
to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: quendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Hillsborough County, Florida.


for Pamala Vazquez
District Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Title V Air Operation Permit (including the Public Notice, the Statement of Basis, and the Draft/Proposed Permit), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 07-13-2011 to the persons listed below.

Mr. Bob Terhune, Responsible Official, Bob.Terhune@MascoCabinetry.com

Mr. Joseph Green, Senior Environmental Engineer, Joseph.Green@MascoCabinetry.com

Mr. Scott Tift, Senior Project Engineer, Scott.Tift@MascoCabinetry.com

Mr. Michael Ballenger, P.E., mballeng@trinityconsultants.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

07-13-2011
(Date)

In addition, copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL (including the DRAFT/PROPOSED permit package) were posted electronically as noted to the person(s) listed below:

Ms. Barbara Friday, DEP BAR (posted electronically on DEP DARM_Common drive by permit engineer and email notification sent to Barbara Friday at barbara.friday@dep.state.fl.us for posting with U.S. EPA, Region 4)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Southwest District
Draft/Proposed Permit No. 0830137-006-AV
Masco Cabinetry LLC, Ocala Plant
Marion County, Florida

Applicant: The applicant for this project is Masco Cabinetry LLC. The applicant's responsible official and mailing address are: Mr. Bob Terhune, VP – Operations, Masco Cabinetry LLC, 4600 Arrowhead Drive, Ann Arbor, MI 48105.

Facility Location: The applicant operates the existing Ocala plant, which is located in Marion County at 1300 SW 38th Avenue, Ocala, Florida.

Project: The applicant applied on June 1, 2011 to the Department for a Title V air operation permit renewal. This is a renewal of Title V air operation permit No. 0830137-005-AV. The existing facility consists of woodworking and finishing operations for the manufacturing of kitchen and bath cabinets. There are four cabinet manufacturing finishing lines that are sources of volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions. The facility also has an existing emergency fire pump.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Department of Environmental Protection's Air Resource Section in the Southwest District is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 13051 N. Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 N. Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

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A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: okuendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

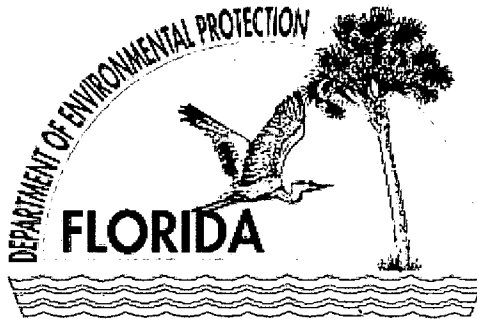
Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Masco Cabinetry LLC
Ocala Plant

Facility ID No. 0830137
Marion County

Title V Air Operation Permit Renewal

Permit No. 0830137-006-AV
(Renewal of Title V Air Operation Permit No. 0830137-005-AV)



Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813) 632-7600
Fax: (813) 632-7668

Compliance Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813) 632-7600
Fax: (813) 632-7668

Title V Air Operation Permit Renewal

Permit No. 0830137-006-AV

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Statement of Basis	
Table H, Permit History.	

DRAFT/PROPOSED PERMIT

PERMITTEE:

Masco Cabinetry LLC
4600 Arrowhead Drive
Ann Arbor, Florida 48105

Permit No. 0830137-006-AV
Ocala Plant
Facility ID No. 0830137
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Ocala Plant is located in Marion County at 1300 SW 38th Avenue, Ocala, Florida. UTM Coordinates are: Zone 17, 384.48 East and 3227.92 North. Latitude is: 29° 10' 28.7" North; and, Longitude is: 82° 11' 17.1" West.

The 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, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 2011
Renewal Application Due Date: March 20, 2013
Expiration Date: October 31, 2013*

Draft/Proposed

Pamala Vazquez
District Program Administrator
Southwest District

**: This facility has been under a long-term shutdown status since October 31, 2008. In accordance with Rule 62-210.300(2)(a)b., F.A.C., the operation permit shall be renewed for a period not to exceed five years from the date of shutdown.*

PLV/cz

SECTION I. FACILITY INFORMATION

Subsection A. Facility Description.

This is a wood furniture manufacturing facility that includes woodworking and finishing operations for the manufacturing of kitchen and bath cabinets.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Cabinet Manufacturing Finishing Lines 1, 2 and 3
002	Cabinet Manufacturing Finishing Line 4
004	Existing Emergency Fire Pump

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received June 1, 2011, this facility is a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU Nos.
40 CFR 63, Subpart A - General Provisions	001 and 002
40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations	001 and 002
40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	004
Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.	001 and 002

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated.
[Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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 or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The procedures to minimize pollutant emissions shall include the following:

- a. Tightly cover or close all VOC containers when they are not in use;
- b. Where possible, tightly cover 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/OS;
- e. Immediately confine and clean up VOC/OS spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal; and
- f. Maintain appropriate records to demonstrate compliance with VOC/HAP emission limits.

[Rule 62-296.320(1), F.A.C. and Construction Permit No. 0830137-003-AC]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. 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.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year.

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

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>.

[Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective.

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

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

- a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
- b. 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]

FW10. Notification of Startup. Since the facility has been under a long-term shutdown status since October 31, 2008, the permittee shall notify the Department in writing of the intent to start up the facility, a minimum of 60 days prior to the intended startup date.

- a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
- b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

SECTION III. MISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 and 002

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Cabinet Manufacturing Finishing Lines 1, 2 and 3
002	Cabinet Manufacturing Finishing Line 4

Finishing Lines 1-3

Finishing Lines 1, 2, and 3 are three identical finishing lines. Each finishing line consists of an overhead hanging conveyor system and a series of high-volume low pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. Specifically, each line consists of the following process areas and equipment:

- A pair of back-to-back spray booths for each application of toners, stains, sealers and topcoats (8 spray booths per line);
- A flash-off area following each pair of sealer and topcoat spray booths (2 flash-off areas per line);
- A gas-fired curing oven following each pair of toner, stain, sealer, and topcoat spray booths (4 ovens per line); and
- A cool-down area following each sealer and topcoat oven (2 cool-down areas per line).

Each conveyor line is designed for a maximum speed of approximately 16 feet per minute. Each line has a processing capacity of 865 cabinets per day based on current coatings, work flow, two shifts per day, and the maximum conveyor line speed.

The total maximum heat input rate of all curing ovens associated with Lines 1-3 is approximately 33 MMBtu/hr.

Finishing Line 4

Finishing Line 4 consists of an overhead hanging conveyor system and a series of high-volume low-pressure (HVLP) spray equipment or equivalent, spray booths, flash-off areas, curing ovens, cool-down areas, associated ductwork, fans, and roof exhaust stacks. Specially, this finishing line consists of the following process areas and equipment:

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

The conveyor line is designed for a maximum speed of approximately 32 feet per minute and. The processing capacity of Line 4 is approximately 1800 cabinets per day based on current coatings, workflow, two shifts, and the maximum conveyor line speed.

The total maximum heat input rate of all curing ovens associated with Line 4 is approximately 18 MMBtu/hr.

SECTION 7. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 and 002

Glaze Line

Glaze is a specialty coating applied only on a limited amount of orders. Finishing would begin on one of the four finishing lines with the application of toner and stain. The cabinet would then be pulled from that line and finished on the Glaze Line. The Glaze Line consists of the following process areas and equipment: glaze booth, flash-off area, and curing oven followed by a topcoat booth, flash-off area, curing oven, and cool-down area. The conveyor line speed is expected to be approximately 15 feet per minute.

Cabinets finished on the Glaze Line and associated emissions are attributed to the line that first began finishing the cabinet, either Lines 1-3 or Line 4.

Offline Booths

There are two offline systems, each consisting of a spray booth and curing oven. The offline spray booths see limited use in the repair of cabinets or finishing specialized parts. Cabinets finished in the Offline Booths and associated emissions are attributed to the line that first began finishing the cabinet or part, either Lines 1-3 or Line 4.

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

Essential Potential to Emit (PTE) Parameters

- A.1. Fuel Limitation:** Each curing oven shall only fire natural gas or propane.
[Construction Permit No. 0830137-003-AC]
- A.2. Hours of Operation.** These emissions units may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C., Construction Permit No. 0830137-003-AC]
- A.3. Emissions Unit Operating Rate Limitation After Testing.** See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.
[Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

- A.4. VOC and HAP Emissions.**
- Lines 1-3:* Total combined Volatile Organic Compound (VOC) emissions from Lines 1-3 shall not exceed 249.0 tons during any consecutive 12 months. Total combined hazardous air pollutant (HAP) emissions from Lines 1-3 shall not exceed 249.0 tons during any consecutive 12 months.
 - Line 4:* Total VOC emissions from Line 4 shall not exceed 166.0 tons during any consecutive 12 months. Total hazardous air pollutant (HAP) emissions from Line 4 shall not exceed 166.0 tons during any consecutive 12 months.

[Rule 62-210.200 (PTE), F.A.C. and Construction Permit No. 0830137-003-AC]

SECTION III. MISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 and 002

Recordkeeping and Reporting Requirements

A.5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.
[Rule 62-4.070(3), F.A.C.]

A.6. Material Content Records. For each VOC and HAP containing material in use at the plant (sap primers, stains, toners, sealers, topcoats, cleaning agents, etc.), the permittee shall keep records that identify each chemical constituent, the corresponding amount used, recognition as a VOC, and recognition as a HAP. Supporting documentation (i.e., chemical usage tracking logs, Material Safety Data Sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be maintained on site for each chemical and related product to include sufficient information to determine usage rates and associated emissions. An electronic database may be used to store and report such information.
[Rule 62-213.440, F.A.C.; Construction Permit No. 0830137-003-AC]

A.7. Monthly Log. To demonstrate compliance with the VOC and HAP emissions limitations of this permit, the permittee shall keep a monthly log of the following information:

- a. Identity and quantity each material used at the facility that contains a VOC or HAP.
- b. Quantify the VOC and HAP emissions for the month and consecutive 12-month total.
- c. Calculate and record the quantity of cabinets produced on Lines 1-3 and Line 4 separately.
- d. Allocate the monthly VOC and HAP emissions between Lines 1-3 and Line 4 separately based on cabinet production. For example:

$$\text{VOC}_{1-3} = (\text{VOC}_{\text{total}}) \times (\text{Cabinets}_{1-3}) \div (\text{Cabinets}_{\text{total}});$$
$$\text{HAP}_{1-3} = (\text{HAP}_{\text{total}}) \times (\text{Cabinets}_{1-3}) \div (\text{Cabinets}_{\text{total}})$$

Cabinets finished on the Glaze Line and Offline Booths shall be attributed to the line that first began finishing the cabinet, either Lines 1-3 or Line 4.

It shall be assumed that all VOC/HAP in materials used are emitted to the atmosphere.

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

- e. Calculate and record the total VOC and HAP emissions for Lines 1-3 and Line 4 for the most recent consecutive 12-month period.

The monthly logs shall be completed within 10 working days of the following month.

[Rule 62-213.440, F.A.C.; Construction Permit No. 0830137-003-AC]

Other Requirements

A.8. Federal Rule Requirements. In addition to the specific conditions listed above, these emissions units are also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations, adopted and incorporated by reference in Rule 62-204.800(11), F.A.C. These requirements are shown in their entirety in Appendices NESHAP 40 CFR 63 Subpart A and NESHAP 40 CFR 63 Subpart JJ, which are a part of this permit.

SECTION 7. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Unit Nos. 001 and 002

40 CFR 63, Subpart JJ Applicable Provision References

(Note: Entire section applies unless otherwise noted with specific applicable subsection references)

- § 63.800 Applicability
 (a), (d), (f) and (g)
- § 63.801 Definitions
- § 63.802 Emission Limits
 (b)
- § 63.803 Work practice standards.
- § 63.804 Compliance procedures and monitoring requirements
 (d), (e)(1), (f) except (f)(4) and (f)(6), and (g) except (g)(4) and (g)(6)
- § 63.805 Performance test methods
 (a)
- § 63.806 Recordkeeping requirements
 All except (f) and (g)
- § 63.807 Reporting requirements
 All except (d)
- § 63.808 Implementation and enforcement

Table 1. General Provisions (NESHAP Subpart A) Applicability to Subpart J)

Table 2. List of Volatile Hazardous Air Pollutants

Table 3. Summary of Emissions Limits

Table 4. Pollutants Excluded from Use in cleaning and Washoff Solvents

Table 5. List of VHAP of Potential Concern Identified by Industry

Table 6. VHAP of Potential Concern

{Permitting Note: This facility is considered a new affected source under 40 CFR 63, Subpart JJ. The above applicability references are based upon current operations as reflected in the Title V air operation permit renewal application received on June 1, 2011. Any change in operations may change the applicable provisions.}

[Rule 62-204.800(11), F.A.C.; 40 CFR 63, Subpart JJ and Subpart A]

SECTION III. MISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Unit No. 004

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
004	Existing Emergency Fire Pump

The Perkins Model 1791/2600 diesel fuel fired emergency fire pump has a rating of 140 HP at 2,350 rpm and was installed in 2000. The fire pump's diesel engine is subject to the requirements of 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE).

Permitting Note:

1. In order to be considered an emergency RICE subject to the 40 CFR 63 Subpart ZZZZ requirements for emergency CI RICE, the engine must be operated in accordance with the requirements specified in 40 CFR 63.6640(f).
2. The stationary CI RICE engine is exempt from the construction permit requirements of Rule 62-210.300(1), F.A.C., in accordance with the provisions of Rule 62-210.300(3)(a)35., F.A.C. (i.e., categorical and conditional exemption for stationary reciprocating internal combustion engines).
3. NSPS 40 CFR 60 Subpart IIII (Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines) does not apply to this engine based on their date of manufacture (i.e., before June 12, 2006).

Operation Requirements

B.1. Operating Hours - There are no specific limitations on operating hours for the fire pump. *(Also see Permitting Note No. 1 above)*
[Rules 62-4.160(2), and 62-210.200 (Definitions – Potential to Emit), F.A.C.]

Applicable Federal Requirements

B.2. 40 CFR 63 Subparts A and ZZZZ Requirements. This emissions unit is subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). These requirements are shown in their entirety in Appendices NESHAP 40 CFR 63 Subpart A and NESHAP 40 CFR 63 Subpart ZZZZ, which are a part of this permit. The fire pump's diesel engine is subject to the requirements for existing RICE ≤ 500 HP located at a major source of hazardous air pollutants (HAP). The following is a summary of these requirements:

Emissions Limitations:

§ 63.6602 and Table 2c

Monitoring, Installation, Collection, Operation and Maintenance Requirements

§ 63.6625(e), (f), (h) and (i)

Continuous Compliance

§ 63.6605 and § 63.6640

Recordkeeping Requirements

§ 63.6655 except § 63.6655(c)

SECTION .. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection B. Emissions Unit No. 004

Reporting Requirements

Footnote 1 of Table 2c

General Provisions

Yes, except per § 63.6645(a)(5), the following do not apply: § 63.7(b) and (c), § 63.8(e), (f)(4) and (f)(6), and § 63.9(b)-(e), (g) and (h).

{Compliance Date Note – The final compliance date for the applicable Subpart ZZZZ requirements for this engine is May 3, 2013. The above applicability summary is based upon current operations as reflected in the Title V air operation permit renewal application received on June 1, 2011. Any change in operations may change the applicable provisions.}

[Rule 62-213.440, F.A.C.; NESHAP 40 CFR 63 Subparts A and ZZZZ]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.

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

Appendix NESHAP 40 CFR 63 Subpart A - General Provisions.

Appendix NESHAP 40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

Appendix NSPS 40 CFR 60, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Appendix RR, Facility-wide Reporting Requirements.

Appendix TR, Facility-wide Testing Requirements.

Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Statement of Basis
Table H, Permit History.