

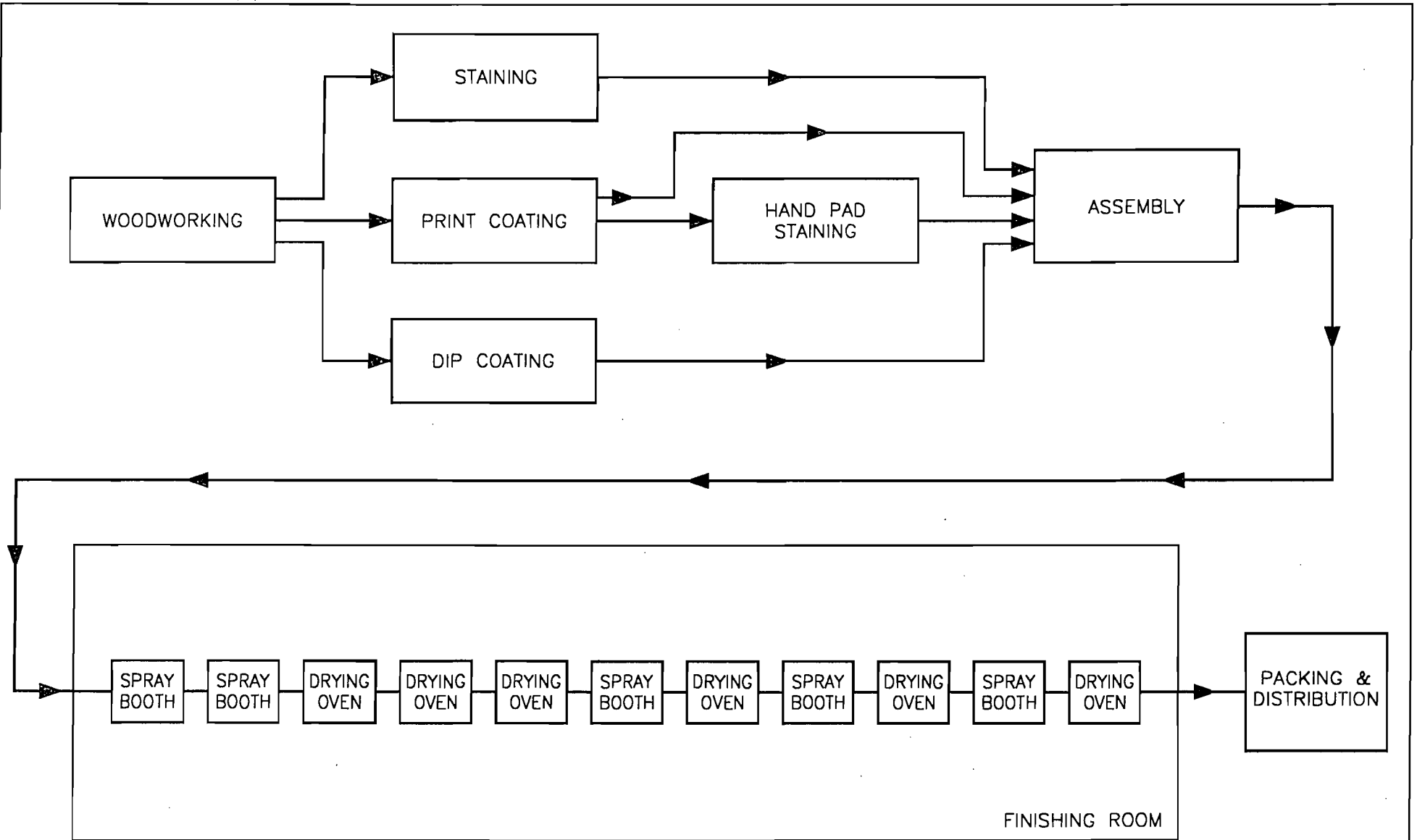


**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**EXHIBIT 3H**

**Finish Coating Operations Flow Diagram**



MITTAUER & ASSOCIATES, INC.  
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Finish Coating Operations Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.3, Document ID: 3H  
Palatka, Florida

## Reynolds, John

---

**From:** Reynolds, John  
**Sent:** Thursday, June 07, 2001 3:44 PM  
**To:** Felton-Smith, Rita  
**Subject:** RE: Florida Furniture

Hi Rita,

Just a note to confirm our conversation earlier today. As we discussed, the determination of "one facility" is based on EPA's May 21, 1998, guidance memo downloaded from their website. Concerning the type of land, the map submitted with the application indicates that most (perhaps 2/3) of the land between the two plants is undeveloped. Regarding common control, the company stated that the two plants will be operated under common ownership and administrative control. Let me know if you have other questions or comments.

Thanks again,

JR

-----Original Message-----

**From:** Felton-Smith, Rita  
**Sent:** Thursday, June 07, 2001 2:30 PM  
**To:** Reynolds, John  
**Subject:** Florida Furniture

John,

**We just received a copy of the draft permit for Florida Furniture. I am wondering how, given the definition of facility, DARM is able to combine the two facilities in one? I read in the write-up that the 2.75 miles between the facility is mainly underdeveloped land. I have talked with several individuals here who have been out to both facilities, we all remember housing, government buildings, and other development between the two sites. We also do not recall that the land in between the two sites as being under common control.**

**Please explain.**

**Rita**

## Reynolds, John

---

**From:** Felton-Smith, Rita  
**Sent:** Friday, November 02, 2001 2:29 PM  
**To:** Reynolds, John  
**Cc:** Kirts, Christopher; Linero, Alvaro  
**Subject:** Florida Furniture's combined AC and Preparing new Title V

John,

I am working on Florida Furniture's new Title V application based on the construction permit issued that combined Plant No. 1 and Plant No. 3. During my review, I have noticed a few differences in the current Title V permits (for the separate facilities 1070026 and 1070002) and the combined AC permit.

1. The construction permit limits the VE emissions from the wood waste boilers to 20% Opacity based on FAC Rule 62-296.310. This rule has not been repealed. Furthermore, these are wood-waste boilers. They were previously subject to the carbonaceous boiler rule in 62-296.410(1)(a). I have not checked the construction permits issued prior to the Final Title V, but this is the rule that was used in the referenced Title V permits. This rule allows for a 40% opacity exception so long as it does not exceed 2 min/hr.
2. The current Title V permits have heat input limits for each of the boilers. The rule basis cited was 62-210.200 (PTE). However, I imagine that these limits were also in the previous permits for these facilities. I noticed that these limits were not in the combined AC. Does that mean, that they are no longer necessary and should not be included in the combined Title V permit? Not even for testing purposes?
3. The current Title V permit No. 1070026-002-AV has a capacity limit on the amount of coatings used at the Finish Coating operation. The limits are in gallons per day, gallons per month, and gallons per year. Has it been determined (in the combined AC) that this limit is no longer necessary? And therefore should not be carried over again into the combined Title V permit?

Thank you.

Rita

Rita Felton-Smith  
Air Permitting Engineer  
FDEP-Northeast District  
(904)807-3300, ext. 3237  
Rita.Felton-Smith@dep.state.fl.us



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

July 17, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy P. Norman, P.E.  
Manager of Environmental Services  
Mittauer & Associates, Inc.  
4611-4 U.S. Highway 17  
Orange Park, Florida 32003

Re: Expiration Date of Permit 1070026-003-AC (Florida Furniture, Inc.)

Dear Mr. Norman:

This confirms your conversation today with our staff regarding the correct expiration date of the above referenced permit. As stated on the cover page of the permit, the expiration date is December 31, 2001. Our file copy shows that the draft typo on page three (2002) was corrected before the final was mailed. Since the permit is for consolidation of two sites as a single facility without requiring any construction, the expiration date of December 31, 2001 was deemed as sufficient.

If there are any questions regarding the above, please call John Reynolds at 850/921-9530.

Sincerely,

A. A. Linero, P.E. Administrator  
New Source Review Section

AAL/JR

cc: Chris Kirts, DEP Northeast District  
William A. Cratch, Florida Furniture, Inc.

"More Protection, Less Process"

Printed on recycled paper.



MITTAUER & ASSOCIATES, INC.  
CONSULTING ENGINEERS

4611-4 U.S. Highway 17  
Orange Park, Florida 32003  
Office: (904) 278-0030  
Fax: (904) 278-0840

RECEIVED

JUL 17 2001

BUREAU OF AIR REGULATION

July 11, 2001

John M. Reynolds  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

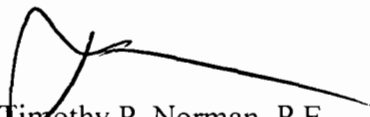
RE: Expiration of Permit No. 1070026-003-AC  
Air Permitting  
Florida Furniture Industries  
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Reynolds:

Upon review of the Final Permit No. 1070026-003-AC for Florida Furniture, we noticed that the expiration date on Page 1 of the permit is still December 31, 2001 while on Page 3, Section II, Item 8 of the permit indicates a December 31, 2002 expiration date. This discrepancy was identified in our June 14, 2001 letter. Please change the expiration date on Page 1 of the permit to December 31, 2002.

We greatly appreciate all your help on this permit. Contact me if you have any questions.

Sincerely,  
Mittauer & Associates, Inc.



Timothy P. Norman, P.E.  
Manager of Environmental Services

TPN/bb

cc: Florida Furniture





**MITTAUER & ASSOCIATES, INC.**  
CONSULTING ENGINEERS

4611-4 U.S. Highway 17  
Orange Park, Florida 32003  
Office: (904) 278-0030  
Fax: (904) 278-0840

---

February 12, 2001

VIA FAX: (850) 922-6979

A. A. Linero, P.E., Administrator  
New Source Review Section  
Florida Department of Environmental Protection  
Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Request for PSD Applicability Determination  
PSD Permitting  
Florida Furniture Industries  
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Linero:

Florida Furniture Industries, Inc. (FFI) is requesting a PSD Applicability Determination for the two facilities it owns and operates in Palatka, Florida. In order for FFI to stay in business and allow 420 people to keep their jobs, the painting operations at Plant No. 1 must be shut down and shifted to Plant No. 3 on or before March 5, 2001. This proposed change would not involve the construction of new facilities at Plant No. 3, merely an increase in the number of personnel and/or hours of operation. In the year 2000, a total of 192.1 tons of VOC's were emitted at Plant No. 1 while 172.7 tons of VOC's were emitted at Plant No. 3. Plant No. 1 is not subject to PSD requirements because it has been in operation as a wood furniture manufacturing facility since 1934.

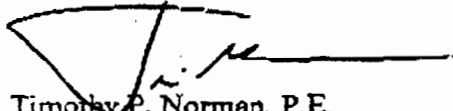
The dry kilns, boiler, and some woodworking operations would continue at Plant No. 1. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc. An exhibit showing the location of the two facilities is attached.

We would like to emphasize that FFI's economic survival hinges on being able to consolidate its painting/coating operations at Plant No. 3. FFI is not currently in a financial condition where it can spend large sums of money on VOC control equipment and their associated O&M costs.

A.A. Linero, P.E., Administrator  
February 12, 2001  
Page 2

We would appreciate a response as soon as possible. Contact me if you have any questions.

Sincerely,  
Mittauer & Associates, Inc.

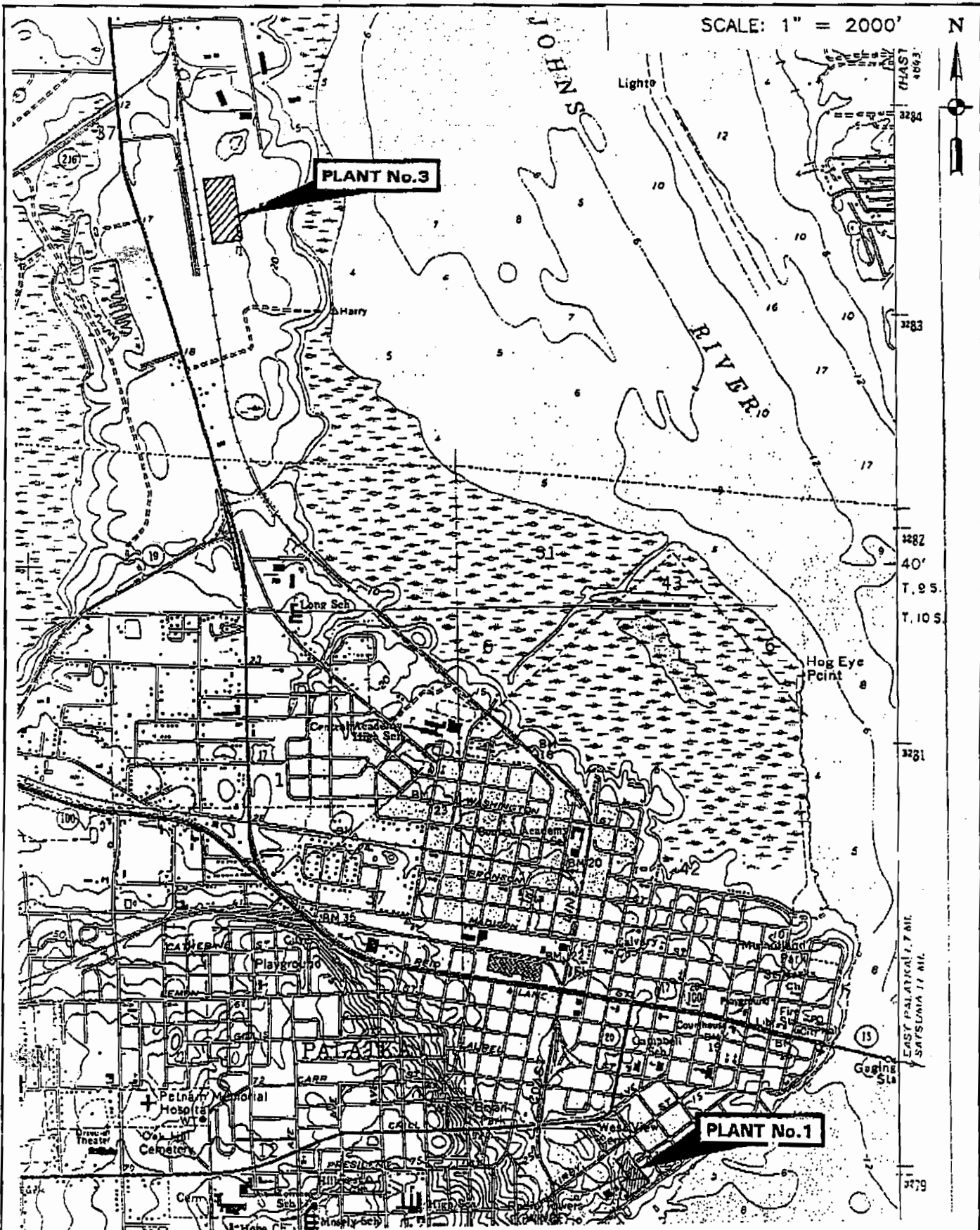
A handwritten signature in black ink, appearing to read 'Timothy P. Norman', with a long horizontal flourish extending to the right.

Timothy P. Norman, P.E.  
Manager of Environmental Services

TPN/bb  
Enclosure

cc/enc: Florida Furniture

SCALE: 1" = 2000'



Job No. 9110-08-1 2/12/01

**MITTAUER & ASSOCIATES, INC.**  
CONSULTING ENGINEERS

4811-4 Highway 17, Orange Park, Florida (904) 278-0030

**FLORIDA FURNITURE INDUSTRIES, INC.**  
Air Permitting  
Facility Location Map  
Putnam County, Florida



**MITTAUER & ASSOCIATES, INC.**  
**CONSULTING ENGINEERS**

4611-4 U.S. Highway 17  
 Orange Park, Florida 32003  
 Office: (904) 278-0030  
 Fax: (904) 278-0840

**RECEIVED**

FEB 13 2001

February 13, 2001

BUREAU OF AIR REGULATION

VIA FAX: (850) 922-6979

John Reynolds  
 Bureau of Air Regulation  
 Florida Department of Environmental Protection  
 Twin Towers Building  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

RE: Summary of VOC Emissions from Plant Nos. 1 and 3  
 Air Permitting  
 Florida Furniture Industries  
 Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Reynolds:

As you requested, we are providing you a summary of the VOC emissions from Plant Nos. 1 and 3 for 1997 through 2000. No AOR's were submitted for either facility prior to 1997 (except for boilers) and only for Plant No. 3 in 1997.

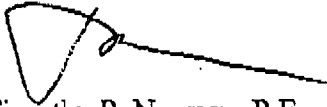
<b>VOC EMISSIONS SUMMARY FROM PLANT NOS. 1 AND 3 FOR 1997 THROUGH 2000</b>			
<b>YEAR</b>	<b>PLANT NO. 1</b>	<b>PLANT NO. 3</b>	<b>TOTAL</b>
1997	No AOR's required	217.74 tons	--
1998	233.13 tons	184.69 tons	417.82 tons
1999	212.22 tons	167.95 tons	380.17 tons
2000	194.10 tons	173.70 tons	367.80 tons

The above figures include VOC emissions from the coating operations, boiler, and dry kilns at Plant No. 1 and the coating operations and boiler at Plant No. 3. The submitted AOR's should be on file with your office.

John Reynolds  
February 13, 2001  
Page 2

Contact me if you have any questions or require additional information.

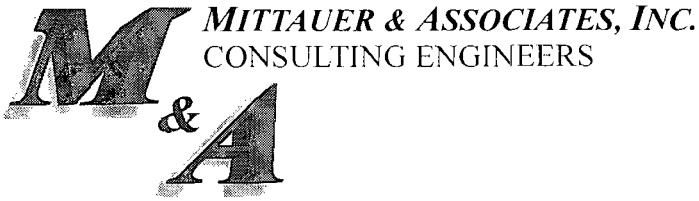
Sincerely,  
Mittauer & Associates, Inc.

A handwritten signature in black ink, consisting of a stylized, somewhat triangular shape on the left and a long, thin horizontal line extending to the right.

Timothy P. Norman, P.E.  
Manager of Environmental Services

TPN/bb

cc: Florida Furniture



4611-4 U.S. Highway 17  
Orange Park, Florida 32003  
Office: (904) 278-0030  
Fax: (904) 278-0840

**RECEIVED**

FEB 16 2001

BUREAU OF AIR REGULATION

**FAXED**  
2/13/01

VIA FAX: (850) 922-6979

February 13, 2001

John Reynolds  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Summary of VOC Emissions from Plant Nos. 1 and 3  
Air Permitting  
Florida Furniture Industries  
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Reynolds:

As you requested, we are providing you a summary of the VOC emissions from Plant Nos. 1 and 3 for 1997 through 2000. No AOR's were submitted for either facility prior to 1997 (except for boilers) and only for Plant No. 3 in 1997.

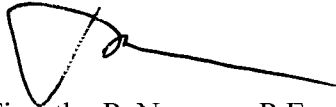
<b>VOC EMISSIONS SUMMARY FROM PLANT NOS. 1 AND 3 FOR 1997 THROUGH 2000</b>			
<b>YEAR</b>	<b>PLANT NO. 1</b>	<b>PLANT NO. 3</b>	<b>TOTAL</b>
1997	No AOR's required	217.74 tons	-
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1999	212.22 tons	167.95 tons	380.17 tons
2000	194.10 tons	173.70 tons	367.80 tons

The above figures include VOC emissions from the coating operations, boiler, and dry kilns at Plant No. 1 and the coating operations and boiler at Plant No. 3. The submitted AOR's should be on file with your office.

John Reynolds  
February 13, 2001  
Page 2

Contact me if you have any questions or require additional information.

Sincerely,  
Mittauer & Associates, Inc.

A handwritten signature in black ink, appearing to read 'Timothy P. Norman', with a long horizontal stroke extending to the right.

Timothy P. Norman, P.E.  
Manager of Environmental Services

TPN/bb

cc: Florida Furniture



4611-4 U.S. Highway 17  
Orange Park, Florida 32003  
Office: (904) 278-0030  
Fax: (904) 278-0840

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MAR 20 2001

BUREAU OF AIR REGULATION

March 14, 2001

A. A. Linero, P.E., Administrator  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Submittal of Permit Application  
Air Permitting  
Florida Furniture Industries  
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Linero:

Florida Furniture Industries, Inc. (FFI) operates two wood furniture manufacturing plants in Putnam County, Plant No. 1 (Permit No. 1070002-002-AV) and Plant No. 3 (Permit No. 1070026-002-AV). The permit for Plant No. 1 expires May 13, 2003 while the permit for Plant No. 3 expires July 22, 2003. These plants are regulated for particulates, HAPs, and VOCs.

Florida Furniture plans to close down the painting operations at the Plant No. 1 site and shift all painting operations to the Plant No. 3 site on March 19, 2001 in order to improve the efficiency of their operations and reduce operating costs. No new facilities will be constructed at the Plant No. 3 site. Only the number of personnel and/or hours of operation will increase. All finish coating operations at the Plant No. 1 site will be terminated. There will be no net increase in VOC emissions from the two plants above the total annual average of 374.49 tons/yr for 1999 and 2000.

The dry kilns, boiler, and woodworking operations would continue at the Plant No. 1 site as currently permitted. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc. The boiler and woodworking operations at Plant No. 3 would remain essentially unchanged from their current permitted status.

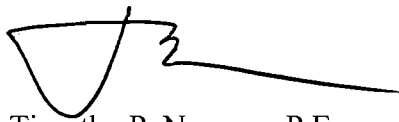


A.A. Linero, P.E.  
March 14, 2001  
Page 2

Enclosed are two (2) copies of DEP Application Form 62-210.900(1) "Application for Air Permit - Title V Source" which reflect consolidating the finish coating operation at the Plant No. 3 site. It is our understanding that there will be no permit fees associated with this application.

Contact me if you have any questions or require additional information.

Sincerely,  
Mittauer & Associates, Inc.

A handwritten signature in black ink, appearing to read "Timothy P. Norman". The signature is written in a cursive style with a long horizontal line extending to the right.

Timothy P. Norman, P.E.  
Manager of Environmental Services

TPN/bb

cc: Florida Furniture



# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

##### Identification of Facility

1. Facility Owner/Company Name: Florida Furniture Industries, Inc.	
2. Site Name: Plant No. 1 and Plant No. 3	
3. Facility Identification Number: 1070002 and 1070026 [ ] Unknown	
4. Facility Location: Street Address or Other Locator: 722 River Street (Plant No. 1) and 160 Comfort Road (Plant No. 3) City: Palatka County: Putnam Zip Code: 32177	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

##### Application Contact

1. Name and Title of Application Contact: Timothy P. Norman, P.E., Manager of Environmental Services	
2. Application Contact Mailing Address: Organization/Firm: Mittauer & Associates, Inc. Street Address: 4611-4 U.S. Highway 17 City: Orange Park State: FL Zip Code: 32003	
3. Application Contact Telephone Numbers: Telephone: (904) 278-0030 Fax: (904) 278-0840	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3/20/01
2. Permit Number:	1070026-003-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: N/A

Operation permit number to be revised: 1070002-002-AV, 1070026-002-AV

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: \_\_\_\_\_

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: \_\_\_\_\_

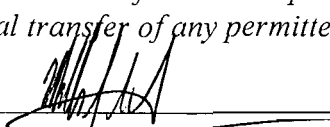
Reason for revision: \_\_\_\_\_

**Air Construction Permit Application N/A**

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: William A. Cratch, VP Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Furniture Industries, Inc. Street Address: P.O. Box 610 City: Palatka State: FL Zip Code: 32178
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (904) 328-3444 Fax: (904) 329-5455
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [✓], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date 03/19/01

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: Timothy P. Norman, P.E. Registration Number: 41128
2. Professional Engineer Mailing Address: Organization/Firm: Mittauer & Associates, Inc. Street Address: 4611-4 U.S. Highway 17 City: Orange Park State: Florida Zip Code: 32003
3. Professional Engineer Telephone Numbers: Telephone: (904) 278-0030 Fax: (904) 278-0840

4. Professional Engineer Statement:

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

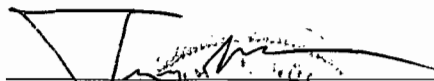
*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant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

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

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

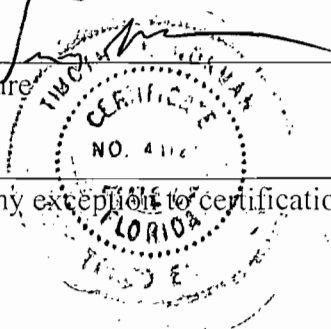
*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [  ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me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

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

  
\_\_\_\_\_  
Signature

3714101  
\_\_\_\_\_  
Date

(seal)



\* Attach any exceptions to certification statement.

**Scope of Application**

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Wood Fired Boiler at Plant No. 1	N/A	0
002	Dry Kiln Nos. 3 & 4 at Plant No. 1	N/A	0
003	Woodworking Dust Collection Plant No. 1	N/A	0
004 (001)*	Wood Fired Boiler at Plant No. 3	N/A	0
005 (002) *	Woodworking Dust Collection at Plant No. 3	N/A	0
006 (003) *	Finish Coating Operation at Plant No. 3	N/A	0
	* Number in parenthesis represents current emissions ID # for Plant No. 3		

**Application Processing Fee**

Check one: [  ] Attached - Amount: \$ \_\_\_\_\_ [X  ] Not Applicable.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

Project will involve consolidating all finish coating operations at Plant No. 3. Finish coating operations will no longer be performed at Plant No. 1. No new facilities will be constructed at Plant No. 3, only the number of personnel and/or hours of operation will increase at Plant No. 3. There will be no net increase in VOC emissions between the two plants. The increase in VOC emissions at Plant No. 3 will be offset by the decrease in VOC emissions at Plant No. 1.

2. Projected or Actual Date of Commencement of Construction: Plant No. 1 began operation in 1934. Plant No. 3 was constructed in 1985.

3. Projected Date of Completion of Construction: N/A

**Application Comment**

N/A

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates:			
Zone: 17		East (km): 438.3	North (km): 3278.9 (Plant No. 1)
Zone: 17		East (km): 436.4	North (km): 3283.4 (Plant No. 3)
2. Facility Latitude/Longitude:			
Latitude (DD/MM/SS): 29°-38'-25" N		Longitude (DD/MM/SS): 81°-38'-5" W (Plant No. 1)	
Latitude (DD/MM/SS): 29°-40'-50" N		Longitude (DD/MM/SS): 81°-39'-25" W (Plant No. 3)	
3. Governmental Facility Code:	4. Facility Status Code:	5. Facility Major Group SIC Code:	6. Facility SIC(s):
0	A	25	2511
7. Facility Comment (limit to 500 characters):			
Florida Furniture Industries, Inc. manufacturers wood bedroom furniture.			

#### Facility Contact

1. Name and Title of Facility Contact: Kenneth G. Loyless, Safety Director	
2. Facility Contact Mailing Address: P.O. Box 610 Organization/Firm: Florida Furniture Industries, Inc. Street Address: 722 River Street (Plant No. 1); 160 Comfort Road (Plant No. 3) City: Palatka State: FL Zip Code: 32178	
3. Facility Contact Telephone Numbers: Telephone: (904) 328-3444 Fax: (904) 328-5455	



**Facility Regulatory Classifications**

**Check all that apply:**

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input checked="" type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	
Hours of operation of the finish coating operations are restricted to <u>1926.5</u> hours/year to maintain total VOC emissions to less than <u>371.55</u> TPY.	

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62.4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.

62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions
62-213.205 F.A.C: Annual Emissions Fee	CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS,
62-213.400 F.A.C: Permits and Permit Revisions Required.	62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-213.410 F.A.C: Changes without Permit Revision	62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.
62-213.420 F.A.C: Permit Applications	62-296.410, F.A.C.: Carbonaceous Fuel, Burning Equipment.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	

## Electronic Code of Federal Regulations

The logo features the text "e-CFR" in a stylized, bold font, with a horizontal line passing through the middle of the letters. Below the line, the letters "TM" are visible.

THIS DATA CURRENT AS OF THE FEDERAL REGISTER DATED MARCH 7, 2002

**40 CFR - CHAPTER I - PART 63**

[View Part](#)

**§ 63.803 Work practice standards.**

(a) *Work practice implementation plan.* Each owner or operator of an affected source subject to this subpart 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 (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

(b) *Operator training course.* Each owner or operator of an affected source 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 this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

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

(c) *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

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

(d) *Cleaning and washoff solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:

- (1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in § 63.801 of this subpart;
- (2) The number of pieces washed off, and the reason for the washoff; and
- (3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(e) *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.

(f) *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(g) *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

(h) *Application equipment requirements.* Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

- (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
- (2) For touchup and repair under the following conditions:
  - (i) The touchup and repair occurs after completion of the finishing operation; or
  - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
- (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
- (4) When emissions from the finishing application station are directed to a control device;
- (5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- (6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

- (i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
  - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- (i) *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
  - (j) *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
  - (k) *Washoff operations.* Each owner or operator of an affected source shall control emissions from washoff operations by:
    - (1) Using normally closed tanks for washoff; and
    - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
  - (l) *Formulation assessment plan for finishing operations.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

- (1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;
- (2) Establishes a **baseline level** of usage by the affected source, for each VHAP identified in paragraph (1)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (1)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of **free formaldehyde** present in the finishing material when it is applied. For **styrene**, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in § 63.805 (d) or (e).
- (3) Tracks the annual usage of each VHAP identified in (1)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
- (4) If, after November 1998, the annual usage of the VHAP identified in paragraph (1)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
  - (i) The exceedance is no more than 15.0 percent above the baseline level;
  - (ii) Usage of the VHAP is below the *de minimis* level presented in Table 5 of this subpart for that (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in § 63.805 (d) or (e));
  - (iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
  - (iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
- (5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (6) If, after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is

present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

[60 FR 62936, Dec. 7, 1995, as amended at 63 FR 71380, Dec. 28, 1998]



## B. FACILITY POLLUTANTS

### List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
CO	B				
PM	B				
PM10	B				
VOC	A	-	374.49	OTHER	001, 002, 004, 006
H020	B				
H046	B				
H047	B				
H053	B				
H060	B				
H085	B				
H095	B				
H096	B				
H113	B				
H115	B				
H120	B				
H123	B				
H132	B				
H169	A				
H182	B				
H186	A				

*Formaldehyde*



### C. FACILITY SUPPLEMENTAL INFORMATION

#### Supplemental Requirements

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>1A3A</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>1B &amp; 3B</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID: <u>1C &amp; 3C</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input checked="" type="checkbox"/> Attached, Document ID: <u>1D &amp; 3D</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <u>1E &amp; 3E</u>
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment:  N/A

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**EXHIBITS 1A 3A**

**1B, 3B**

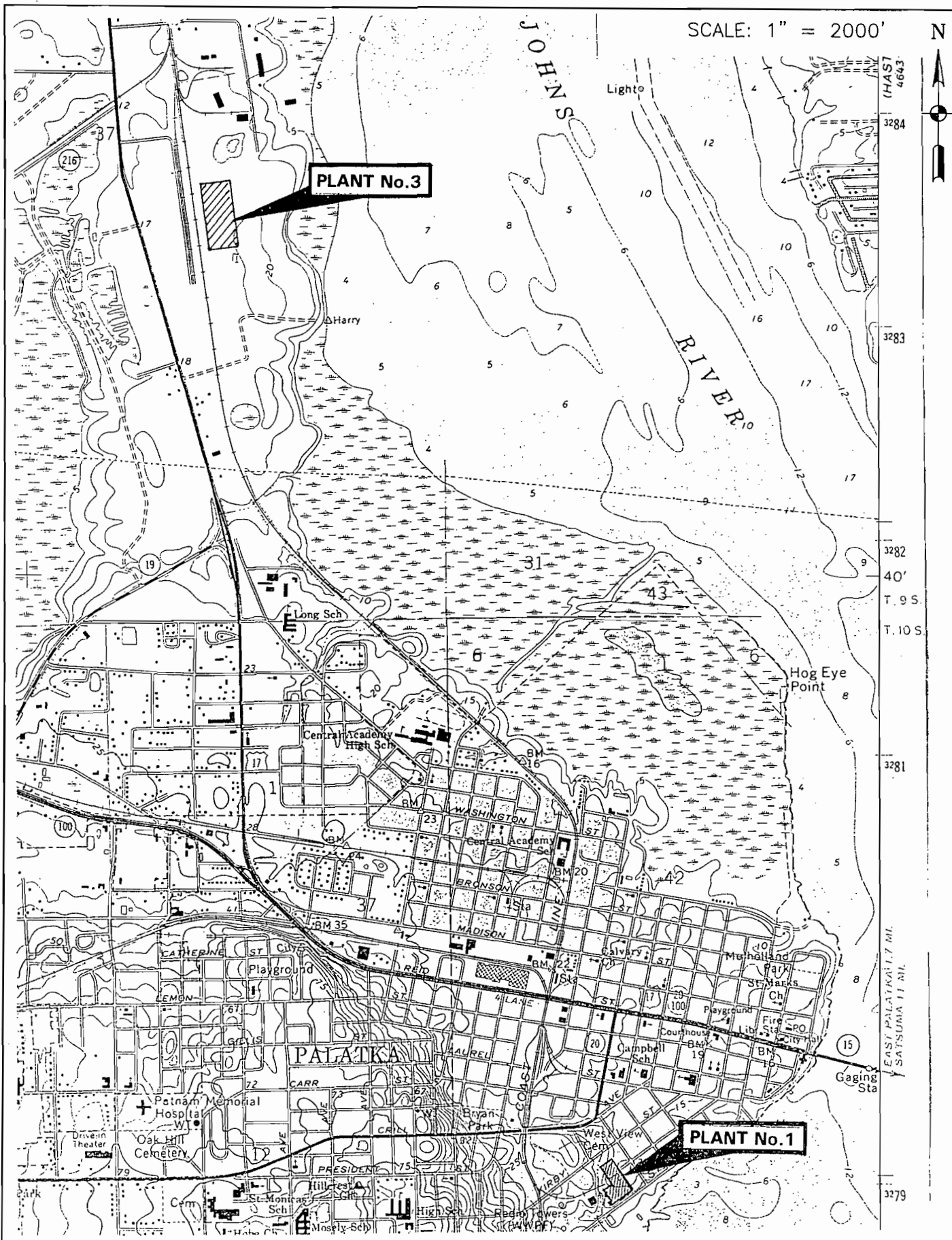
**1C, 3C**

**1D, 3D**

**1E, 3E**

SCALE: 1" = 2000'

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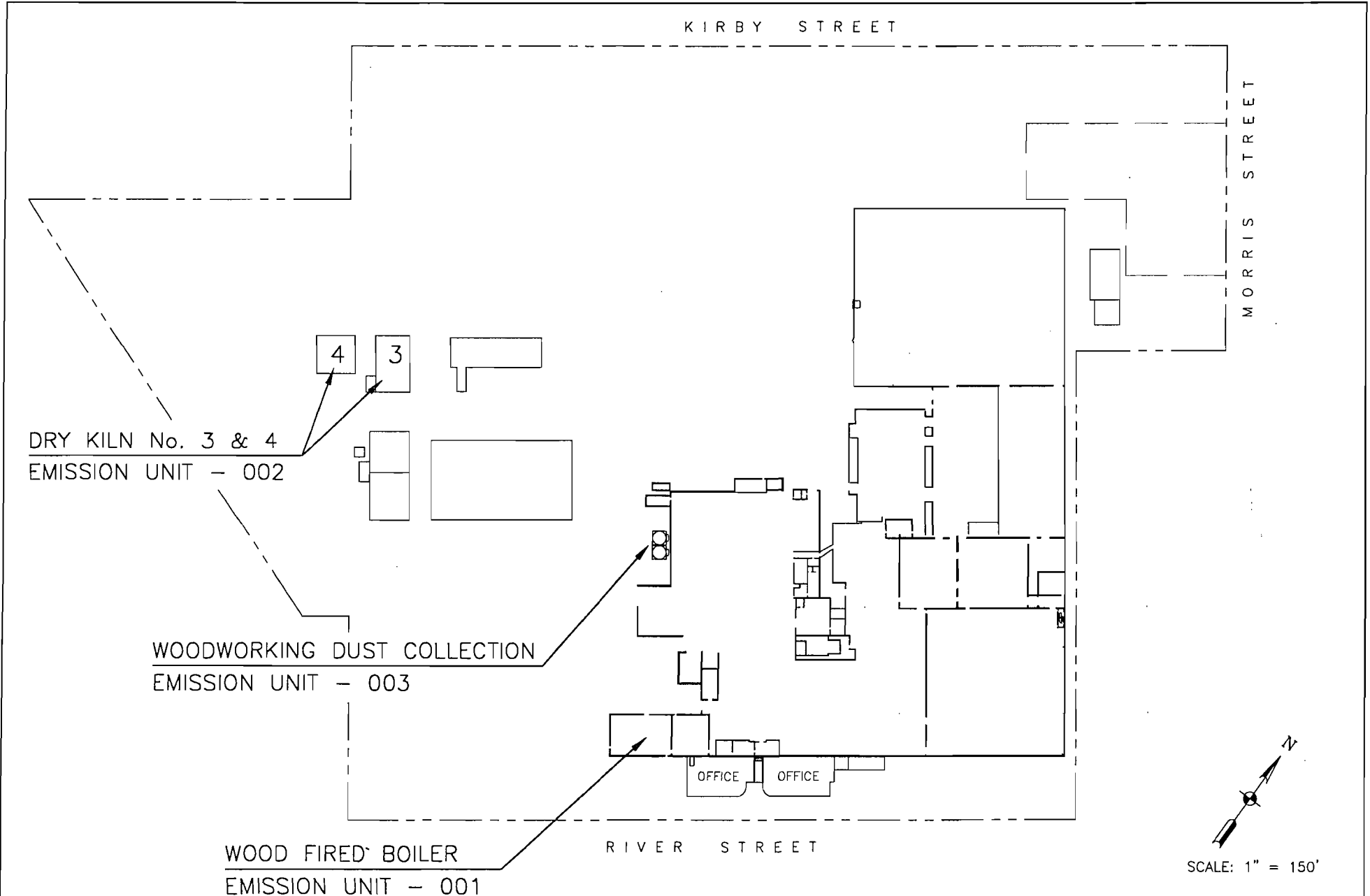


Job No. 9110-08-1 2/12/01, Revised 3/9/01

**MITTAUER & ASSOCIATES, INC.**  
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

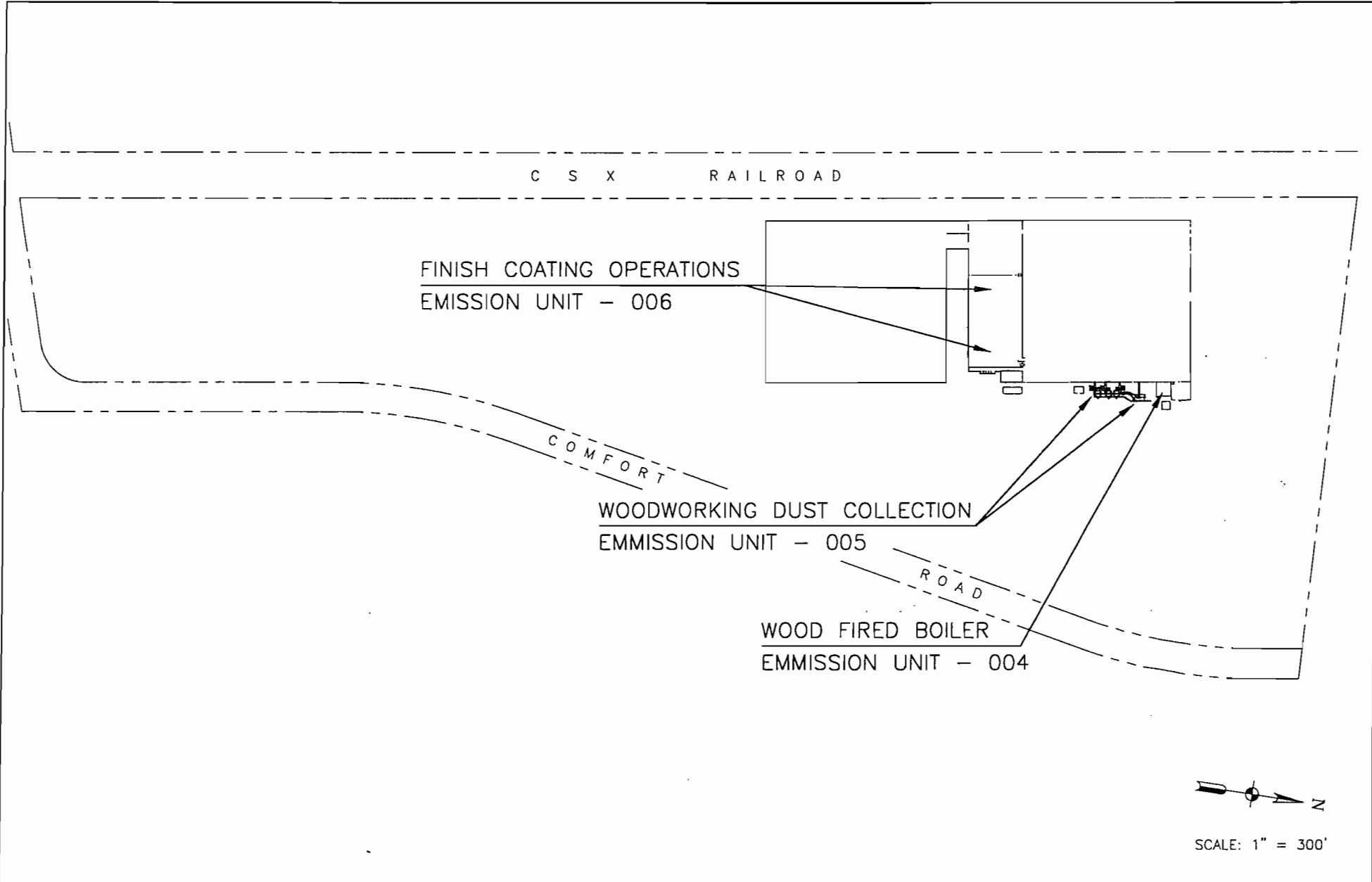
**FLORIDA FURNITURE INDUSTRIES, INC.**  
Air Permitting  
Facility Location Map, Document ID: 1A 3A  
Putnam County, Florida



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CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

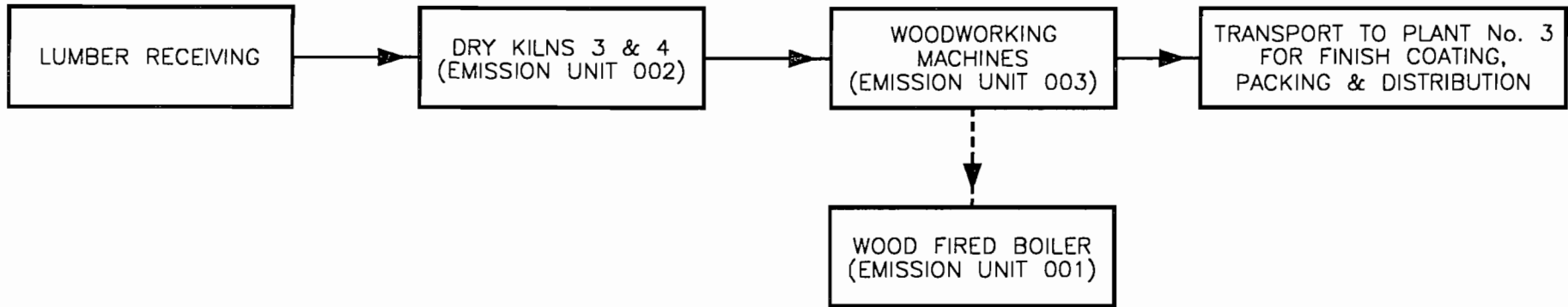
Facility Plot Plan  
Florida Furniture Industries, Inc.  
Plant No.1, Document ID: 1B  
Palatka, Florida

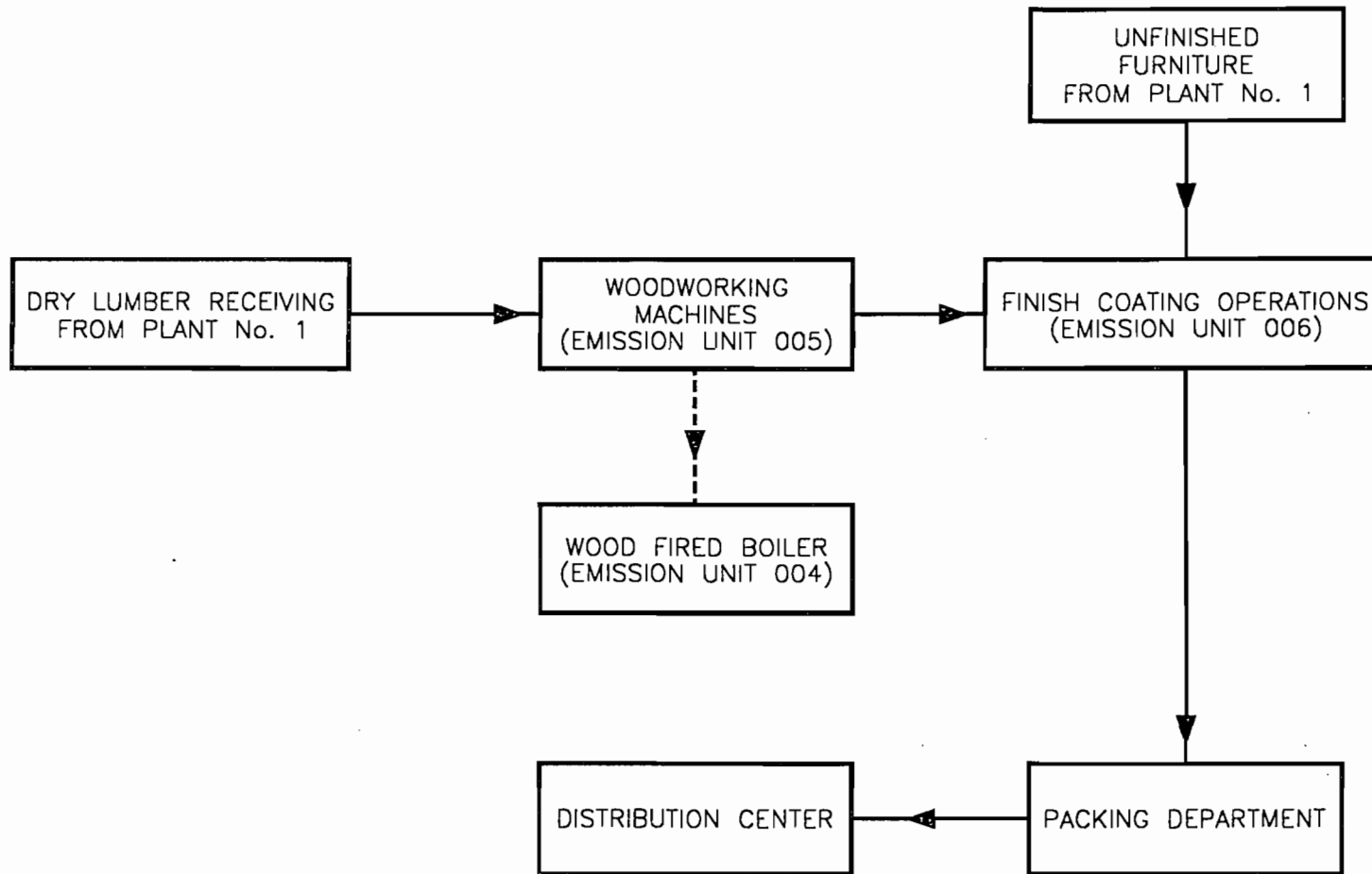


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CONSULTING ENGINEERS

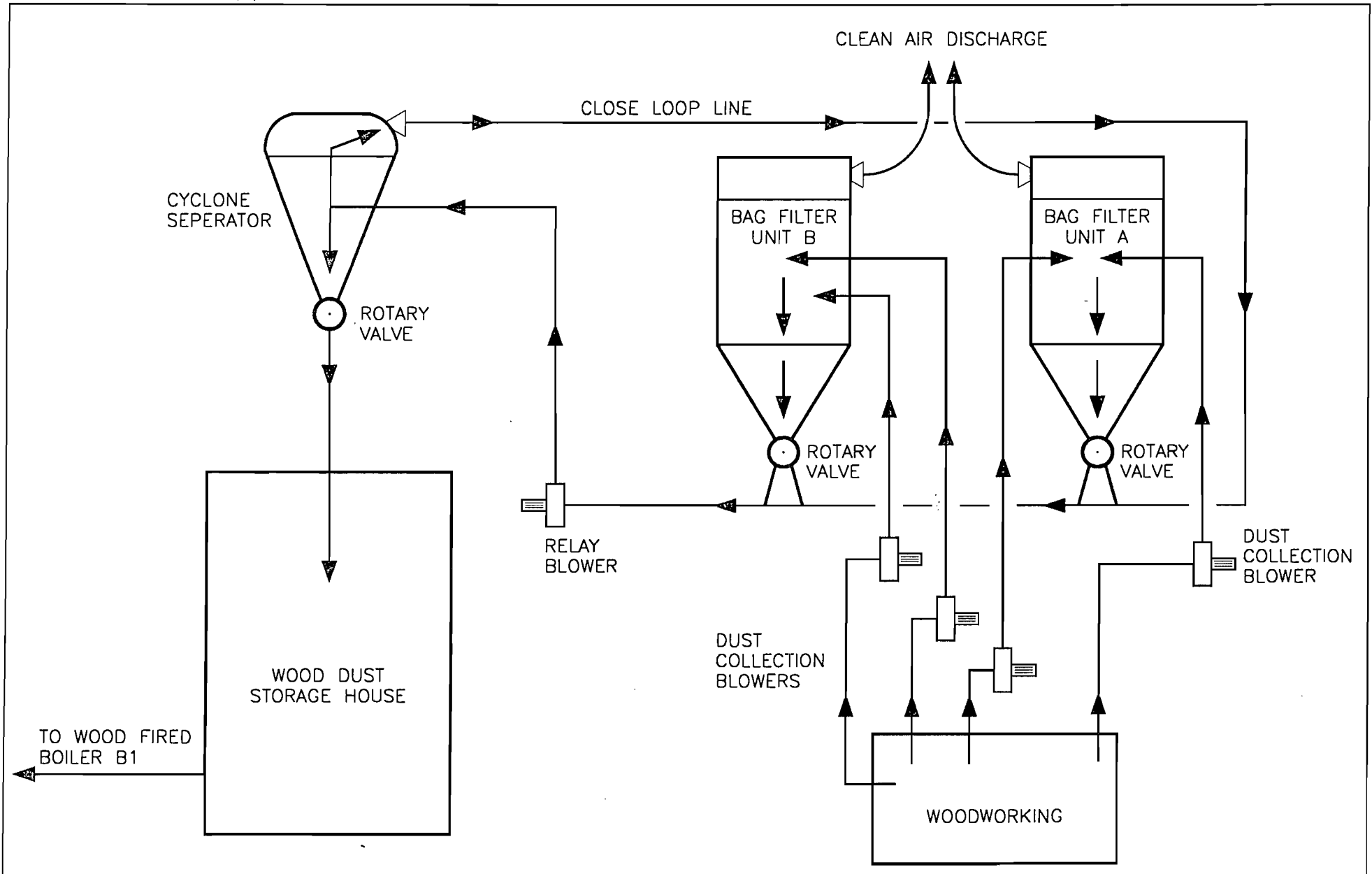
4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Facility Plot Plan  
Florida Furniture Industries, Inc.  
Plant No.3, Document ID: 3B  
Palatka, Florida





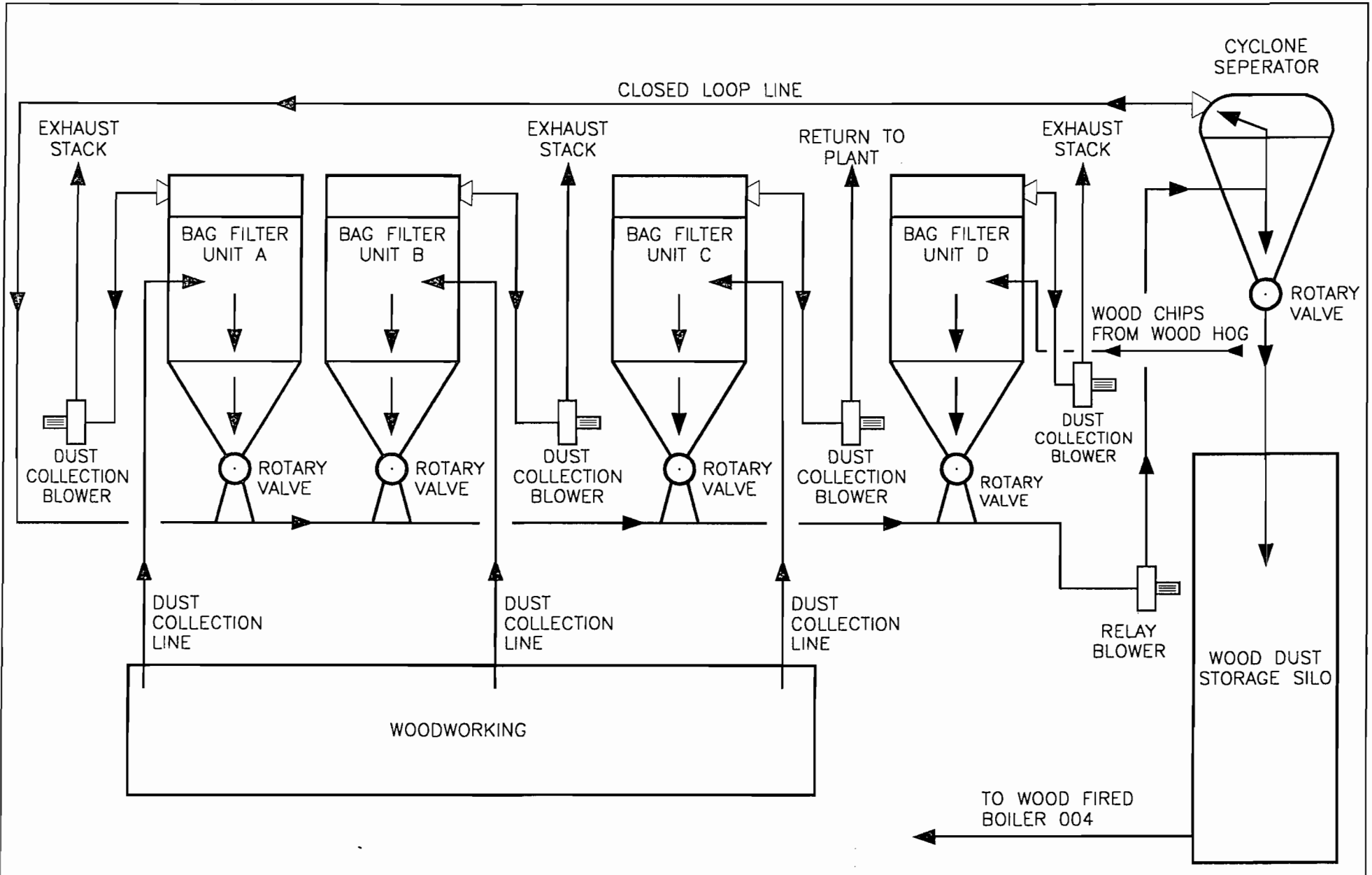




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4611-4 Highway 17, Orange Park, Florida (904) 278-0030

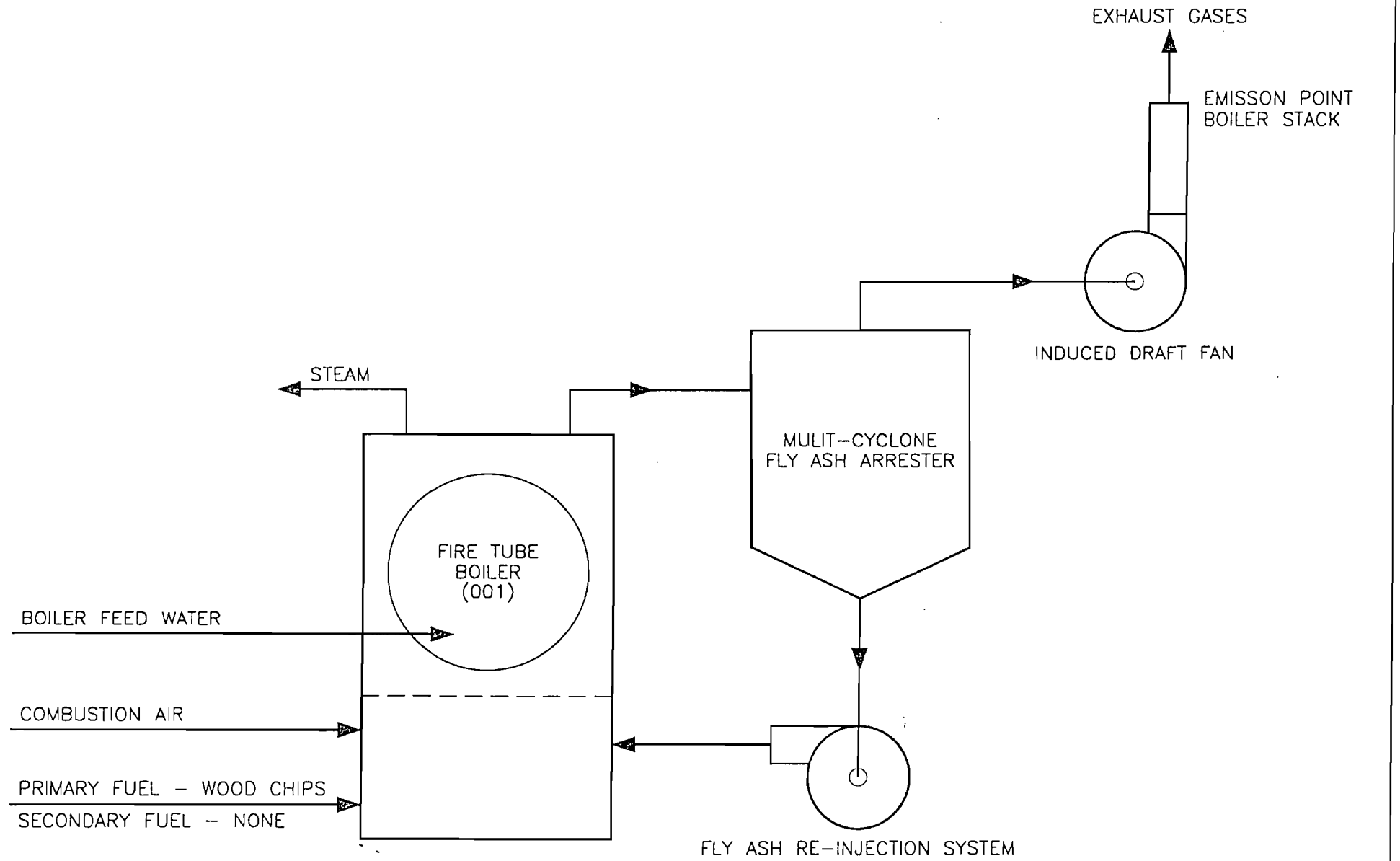
Woodworking Dust Collection Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.1, Document ID: 1D  
Palatka, Florida



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CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

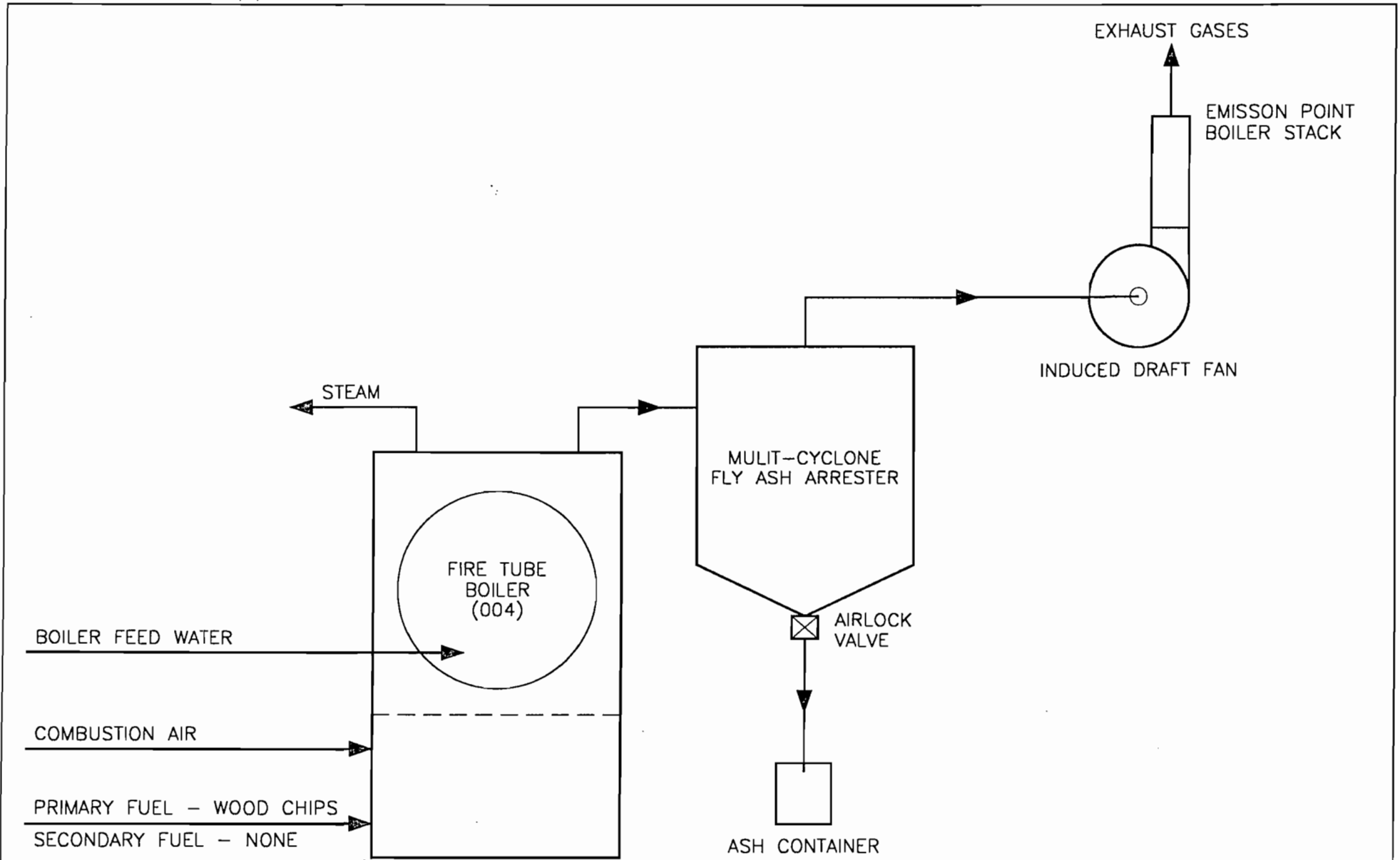
Woodworking Dust Collection Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.3, Document ID: 3D  
Palatka, Florida



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CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.1, Document ID: 1E  
Palatka, Florida



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Wood Fired Boiler Process Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.3, Document ID: 3E  
Palatka, Florida

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p>Wood fired boiler at Plant No. 1</p>			
<p>4. Emissions Unit Identification Number: <span style="float: right;"><input type="checkbox"/> No ID</span></p> <p>ID: 001 <span style="float: right;"><input type="checkbox"/> ID Unknown</span></p>			
<p>5. Emissions Unit Status Code:</p> <p>A</p>	<p>6. Initial Startup Date:</p> <p>1963</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p>2511</p>	<p>8. Acid Rain Unit?</p> <p><input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>Boiler provides steam to Plant No. 1 for heating of dry kilns and for heating of the manufacturing facility.</p>			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Wood burning boiler fed with wood chips and sawdust with multicyclone fly ash arrestor and fly ash re-injection system.

2. Control Device or Method Code(s): 077

**Emissions Unit Details**

1. Package Unit:	
Manufacturer: The Bigelow Company	Model Number: HRT
2. Generator Nameplate Rating: N/A	MW
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	18.24	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	1,960 lb/hr	23.52 ton/day
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	Throughput based on current permitted rate.	

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
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62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.



**List of Applicable Regulations**

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? 001		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  Boiler stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
5. Discharge Type Code: V	6. Stack Height: 50 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 491 °F	9. Actual Volumetric Flow Rate: 6,600 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17                      East (km): 438.3                      North (km): 3278.9			
14. Emission Point Comment (limit to 200 characters):  N/A			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
**(All Emissions Units)**

**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC): 1-02-009-06		3. SCC Units: Tons burned
4. Maximum Hourly Rate: 0.98 tons/hr	5. Maximum Annual Rate: 8,585 tons/yr	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0	8. Maximum % Ash: 1.2	9. Million Btu per SCC Unit: 18.61
10. Segment Comment (limit to 200 characters):  N/A		

**Segment Description and Rate:** Segment \_\_\_\_\_ of \_\_\_\_\_ N/A

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO	077	N/A	NS
PM	077	N/A	NS
VOC	077	N/A	NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 7.47 lb/hour 32.70 tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters):  $\frac{13.6 \text{ lbs / ton} \times 4,809.24 \text{ tons / yr}}{2000 \text{ lbs / ton}} = 32.70 \text{ tons / yr} = 7.47 \text{ lbs / hr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  N/A	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:      20 %      Exceptional Conditions:      40% Maximum Period of Excess Opacity Allowed:      2 min/hour	
4. Method of Compliance: Boiler operators would monitor equipment functions and stack VE. Any malfunction immediately reported.	
5. Visible Emissions Comment (limit to 200 characters):  N/A	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor N/A of     

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number:      Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram [X] Attached, Document ID: <u>1E</u> [ ] Not Applicable    [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [X] Attached, Document ID: <u>1F</u> [ ] Previously submitted, Date: _____ [ ] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID: _____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:  <p style="text-align: center;">N/A</p>

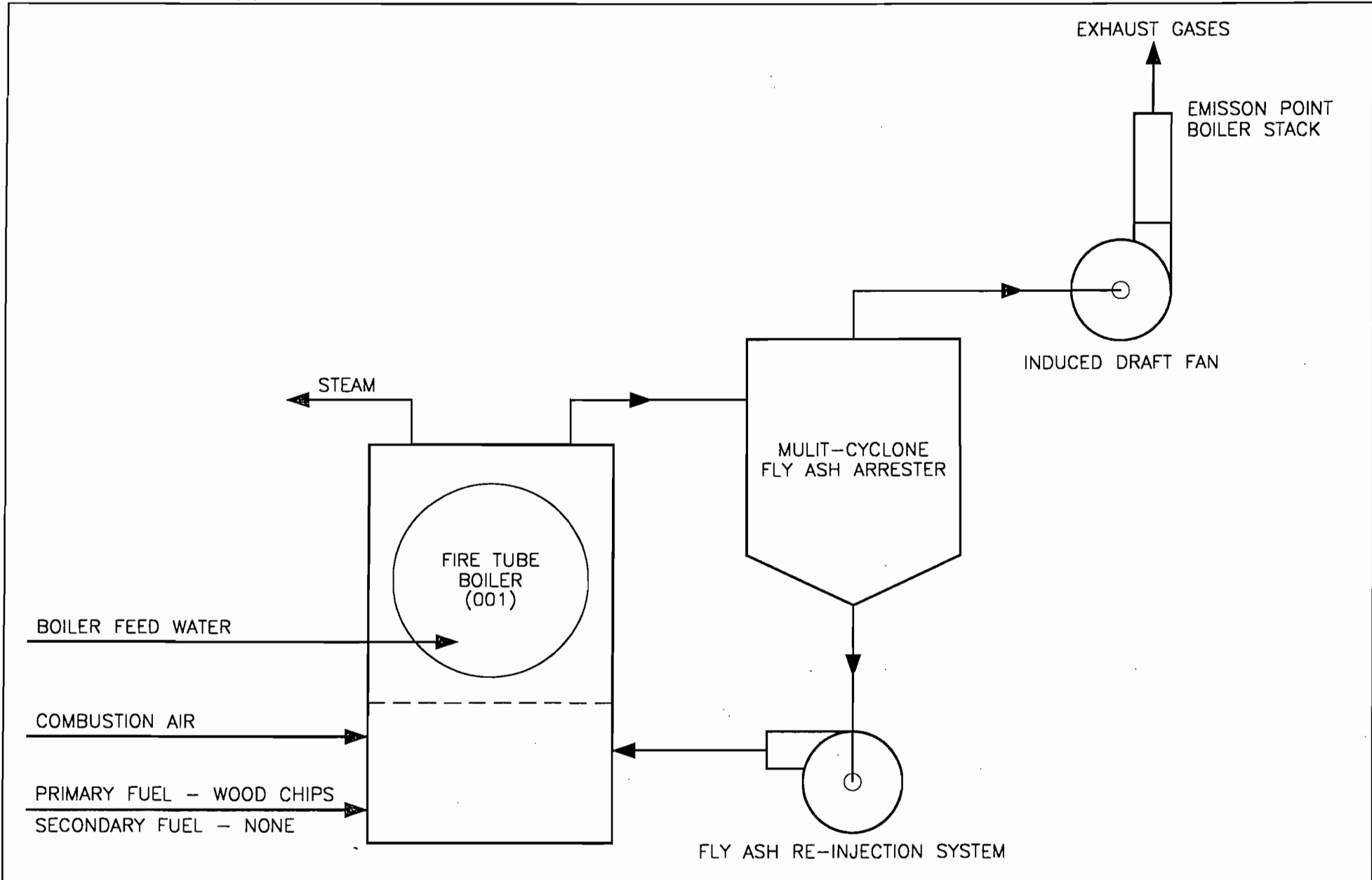
**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable



**EXHIBIT IE**

**Wood Fired Boiler Process Flow Diagram**



MITTAUER & ASSOCIATES, INC.  
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.1, Document ID: 1E  
Palatka, Florida

**EXHIBIT 1F**

**Visible Emissions Testing for Wood  
Fired Boiler 001 at Plant No. 1**

5

COPY

**SOURCE TEST REPORT**  
**VISIBLE EMISSIONS TESTING**  
**FROM**  
**PLANT 1**  
**FLORIDA FURNITURE INDUSTRIES**  
**722 RIVER STREET**  
**PALATKA, FLORIDA 32177**

**WOOD FIRED BOILER**  
**DUST COLLECTORS A AND B**

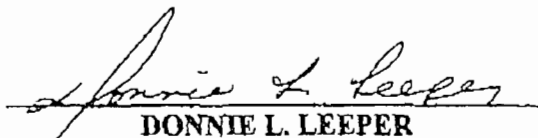
**JANUARY 30, 2001**

**TITLE V AIR PERMIT NUMBER**

**1070002-AV**

**PREPARED FOR**  
**FLORIDA FURNITURE INDUSTRIES**  
**P.O. BOX 710**  
**PALATKA, FLORIDA**

**PREPARED BY**  
**ASTECH ENVIRONMENTAL SERVICES**  
**13170-58 ATLANTIC BLVD. SUITE 131**  
**JACKSONVILLE, FLORIDA 32225**  
**(904) 221-7174**

  
**DONNIE L. LEEPER**

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9    203A    203B    Other \_\_\_\_\_

Company Name  
**Florida Furniture Industries**  
 Facility Name  
**Plant 1**  
 Street Address  
**712 River Street**  
 City  
**PALATKA**    State  
**FL**    Zip  
**32177**

Process  
**Wood Boiler**    Unit #  
**ca. 100,000**  
 Control Equipment  
**N/A**    Operating Mode  
**N/A**

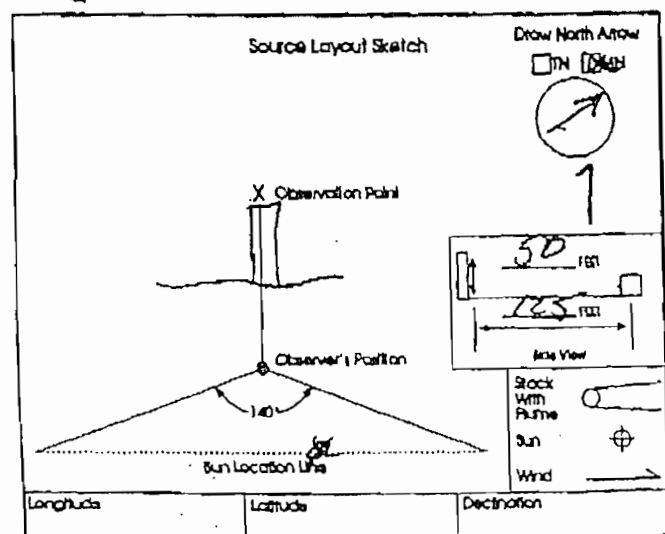
Describe Emission Point  
**~ 36" Circular Stack grey in color**

Height of Emiss. Pt.  
 Start **~ 50'** End **Same**    Height of Emiss. Pt. Rel. to Observer  
 Start **~ 50'** End **Same**  
 Distance to Emiss. Pt.  
 Start **~ 125'** End **Same**    Direction to Emiss. Pt. (Degrees)  
 Start **280°** End **Same**

Vertical Angle to Obs. Pt.  
 Start **~ 3°** End **Same**    Direction to Obs. Pt. (Degrees)  
 Start **280°** End **Same**  
 Distance and Direction to Observation Point from Emission Point  
 Start **125' - 280°** End **Same**

Describe Emissions  
 Start **Coning Plume** End **Same**  
 Emission Color  
 Start **black** End **Same**    Water Droplet Plume  
 Attached  Detached  None

Describe Plume Background  
 Start **sky** End **Same**  
 Background Color  
 Start **blue-white** End **Same**    Sky Conditions  
 Start **broken** End **Same**  
 Wind Speed  
 Start **3-5** End **Same**    Wind Direction  
 Start **ESE** End **Variable**  
 Ambient Temp.  
 Start **60°** End **60°**    Wet Bulb Temp.  
 Start \_\_\_\_\_ End \_\_\_\_\_    RH Percent



Additional Information

Form Number \_\_\_\_\_ Page 1 of 1  
 Continued on VEO Form Number \_\_\_\_\_

Sec	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
1	0	0	0	0	0852	0922	
2	0	5	5	5			
3	10	10	10	10			
4	15	10	15	15			
5	15	15	15	5			
6	0	0	0	0			
7	0	0	0	5			
8	5	0	0	0			
9	0	0	0	0			
10	0	5	0	5			
11	5	0	5	5			
12	5	5	0	5			
13	5	0	0	0			
14	5	0	0	0			
15	15	15	10	10			
16	10	15	10	5			
17	5	10	10	5			
18	5	5	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	5	0	0	0			
22	5	5	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	5	0	0			
27	10	5	10	10			
28	10	10	15	15			
29	10	10	10	10			
30	5	0	0	0			

Observer's Name (Print)  
**Danie Lopez**  
 Observer's Signature  
**Danie Lopez**    Date  
**1-30-04**  
 Organization  
**Asell Environmental Services**  
 Certified by  
**E.T.A.**    Date  
**12-6-01**

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Donnie Leeper*

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Locallon

December 6, 2000

Date of Issue

*Thomas Gore*

President

*Michael W. Sunford*

Director of Training

### III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

#### A. GENERAL EMISSIONS UNIT INFORMATION (All Emissions Units)

##### Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):  Dry kiln Nos. 3 & 4 at Plant No. 1.			
4. Emissions Unit Identification Number: ID: 002 <span style="float: right;"><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</span>			
5. Emissions Unit Status Code: A	6. Initial Startup Date: No. 3 8/24/84 No. 4 7/24/00	7. Emissions Unit Major Group SIC Code:  2511	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)  Dry kilns loaded with poplar lumber on a 4-day cycle. Wet lumber (approximately 25% moisture) is dried to a moisture content of 8%. The dry kilns are heated by steam from the wood burning boiler located at Plant No. 1. Drying temperature is maintained by controls at 170° F. Kilns 3 and 4 are in separate buildings.			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

N/A

2. Control Device or Method Code(s): N/A

**Emissions Unit Details**

1. Package Unit:	
Manufacturer: BOLD Designs	Model Number: 4290
2. Generator Nameplate Rating: N/A	MW
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F



**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	200,000 bdf/4 days = 18,200,000 bdf/yr	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	<p>Kilns operate 24-hours per day, 7 days per week, 52 weeks per year. Cycle time is approximately 4 days or 91 cycles per year. An average of 8,928,610 bdf/yr of lumber was dried in the kilns in 1999 and 2000.</p>	

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
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62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
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62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? 002		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  No VE.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  002			
5. Discharge Type Code: R	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: 170 °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Kiln No. 3 = 23 feet Kiln No. 4 = 29 feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3283.9			
14. Emission Point Comment (limit to 200 characters):  Kiln Nos. 3 and 4 emission points are wall vents front and rear.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
**(All Emissions Units)**

**Segment Description and Rate:** Segment  N/A  of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  N/A – Steam is generated by wood fired boiler (001).		
2. Source Classification Code (SCC): N/A	3. SCC Units: N/A	
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment (limit to 200 characters):  N/A		

**Segment Description and Rate:** Segment   of   N/A

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):  		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):  		

**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

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

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <p align="center">VOC</p>	2. Total Percent Efficiency of Control: <p align="center">N/A</p>
3. Potential Emissions: <p align="center">0.44 lb/hour                      1.92 tons/year</p>	4. Synthetically Limited? [   ]
5. Range of Estimated Fugitive Emissions: N/A [   ] 1            [   ] 2            [   ] 3            _____ to _____ tons/year	
6. Emission Factor: 0.211 lb/1000 bdf Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters):  $\frac{(0.211 \text{ lbVOC} / 1000 \text{ bdf})(200,000 \text{ bdf} / 4 \text{ days})}{(24 \text{ hr day}^{-1})} = 0.44 \text{ lb hr}^{-1}$ $\frac{(0.211 \text{ lbVOC} / 1000 \text{ bdf})(18,200,000 \text{ bdf} / \text{yr}^{-1})}{(2000 \text{ lbs ton}^{-1})} = 1.92 \text{ tons yr}^{-1}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <p align="center">N/A</p>	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <p align="center">lb/hour                      tons/year</p>
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	





**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION**  
**(Regulated Emissions Units Only)**

**Supplemental Requirements**

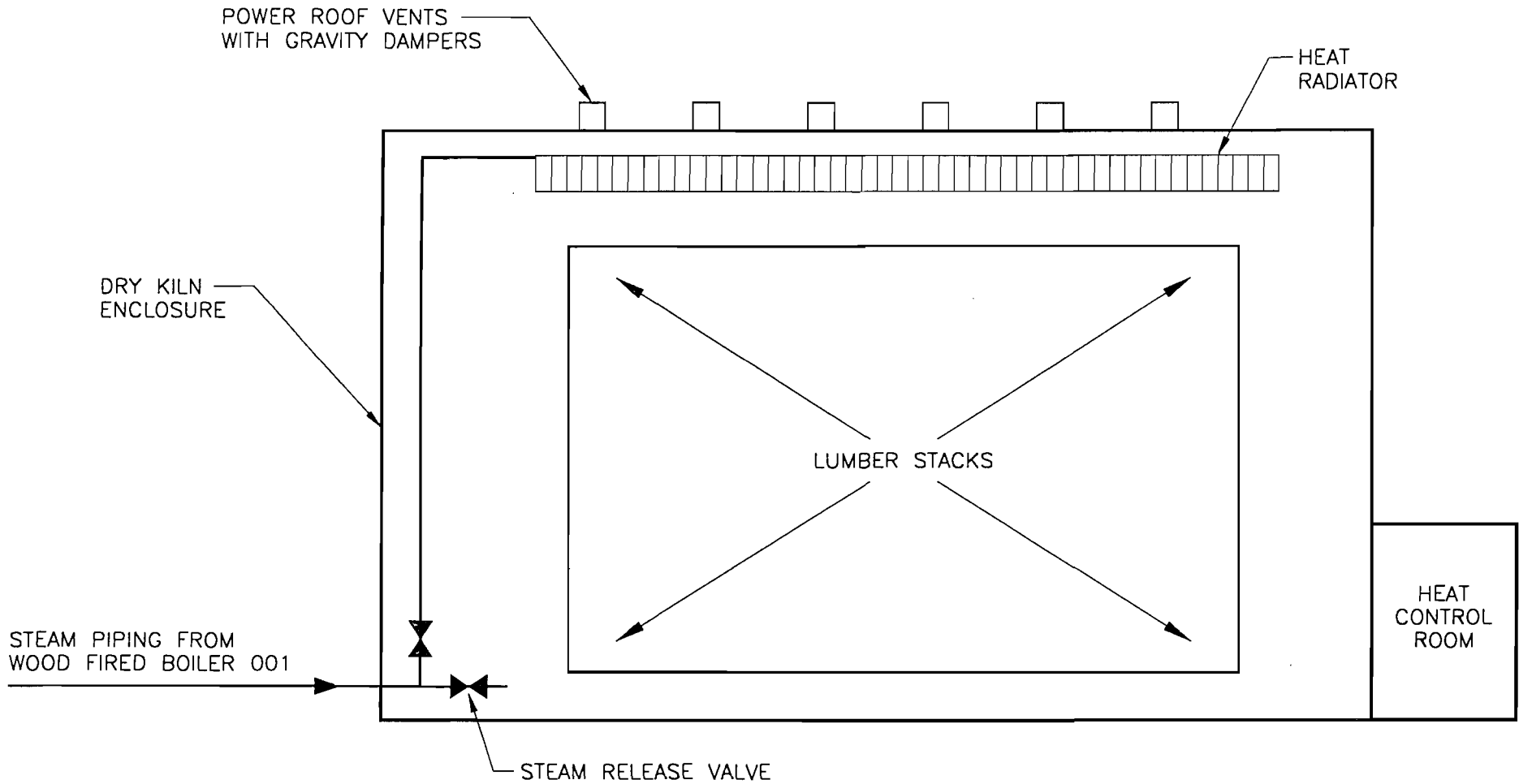
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>1G</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:  <p style="text-align: center;">N/A</p>

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**EXHIBIT 1G**

**Dry Kiln Process Flow Diagram**



DRY KILN No. 3 & 4  
EMISSION UNIT DK1

*MITTAUER & ASSOCIATES, INC.*  
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Dry Kiln Process Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.1, Document ID: 1G  
Palatka, Florida

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application:

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p>Wood dust collection unit consisting of 2 bag filter units and cyclone unit at Plant No. 1 site.</p>			
<p>4. Emissions Unit Identification Number: <span style="float: right;"><input type="checkbox"/> No ID</span></p> <p>ID: 003 <span style="float: right;"><input type="checkbox"/> ID Unknown</span></p>			
<p>5. Emissions Unit Status Code:</p> <p style="text-align: center;">A</p>	<p>6. Initial Startup Date:</p> <p>Bag Filters 7/89 Cyclone 4/97</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p style="text-align: center;">2511</p>	<p>8. Acid Rain Unit?</p> <p style="text-align: center;"><input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>Wood dust and chips originate from the woodworking area. The dust and chips are pneumatically conveyed under vacuum to the wood storage house via closed loop system. Air is filtered at Bag Filter Unit A and B prior to being discharged to the atmosphere.</p>			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter A

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 7,044 S.F. of filter area

456 Filter Bags, each 12' long

16 oz. Single Polyester Felt Filter Bags, 99.96% efficient @ 3 microns

Air to Cloth Ratio – 9.76:1

Filtered Air – 68,780 CFM

2. Control Device or Method Code(s): 101

**Emissions Unit Details**

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: 13.5-456-12

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**Emissions Unit Control Equipment**

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p><u>Bag Filter B</u></p> <p>Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.</p> <p>13.5' dia. Filter, 7,044 S.F. of filter area          456 Filter Bags, each 12' long          16 oz. Single Polyester Felt Filter Bags, 99.96% efficient @ 3 microns          Air to Cloth Ratio – 9.52:1          Filtered Air – 67,035 CFM</p>
<p>2. Control Device or Method Code(s): 101</p>

**Emissions Unit Details**

<p>1. Package Unit:          Manufacturer: Pneumafil Corporation                      Model Number: 13.5-456-12</p>						
<p>2. Generator Nameplate Rating: N/A                      MW</p>						
<p>3. Incinerator Information: N/A</p> <table style="width: 100%; border: none;"> <tr> <td style="padding-left: 100px;">Dwell Temperature:</td> <td style="text-align: right;">°F</td> </tr> <tr> <td style="padding-left: 100px;">Dwell Time:</td> <td style="text-align: right;">seconds</td> </tr> <tr> <td style="padding-left: 50px;">Incinerator Afterburner Temperature:</td> <td style="text-align: right;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	5,236 lb/hr	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	<p>Maximum capacity = 5,236 lb/hr as per phone conversation with Chas Campbell of Clean Air Systems, Statesville, NC, (704) 873-9998. Current throughput based on year 2000 data is estimated at 2,615 lb/hr.</p>	



**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? 003		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. Clean air discharge point on Bag Filter Unit A. 2. Clean air discharge point on Bag Filter Unit B. 3. Cyclone has no emission point as its air discharge is returned to the bag filters.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
5. Discharge Type Code: H	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Filters A & B = 50 feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3278.9			
14. Emission Point Comment (limit to 200 characters):  N/A			

**E. SEGMENT (PROCESS/FUEL) INFORMATION  
(All Emissions Units)**

**Segment Description and Rate:** Segment N/A of       

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  N/A		
2. Source Classification Code (SCC): N/A		3. SCC Units: N/A
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment (limit to 200 characters):  N/A		

**Segment Description and Rate:** Segment        of       

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: PM/PM10	2. Total Percent Efficiency of Control: 99.96
3. Potential Emissions: 2.09 lb/hour	4. Synthetically Limited? [X] 9.17 tons/year
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: 0.04 % Reference: Manufacturer's data.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters):  $5,236 \text{ lb/hr} \times 0.04\% = 2.09 \text{ lb/hr}$ $\frac{2.09 \text{ lb/hr} \times 8,760 \text{ hrs/yr}}{2000 \text{ lbs/ton}} = 9.17 \text{ tons/yr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  N/A	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	





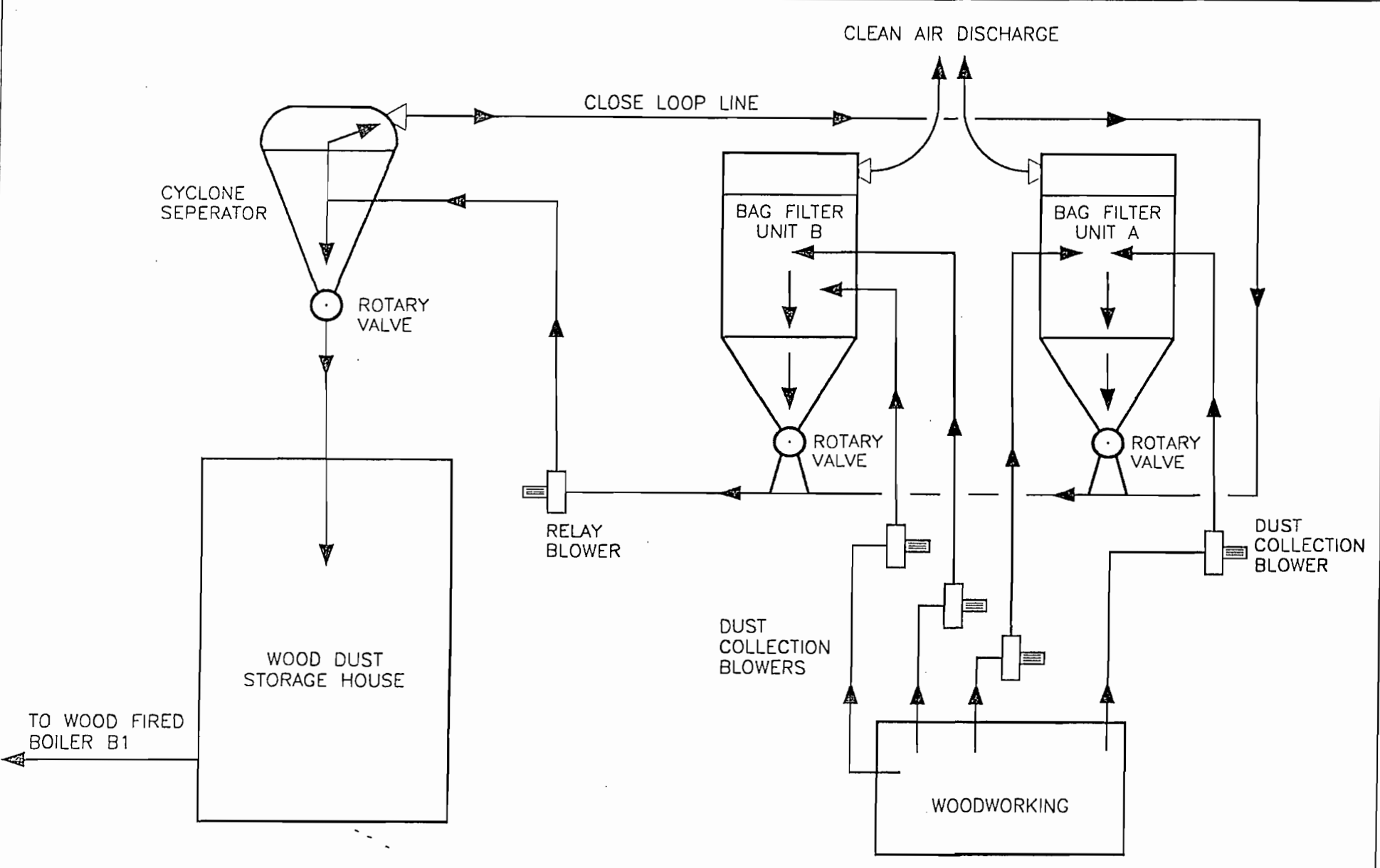


**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**EXHIBIT 1D**

**Woodworking Dust Collection Flow Diagram**



Woodworking Dust Collection Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.1, Document ID: 1D  
Palatka, Florida

**EXHIBIT 1H**

**Visible Emissions Testing for Wood Dust  
Collection at Plant No. 1**

COPY

SOURCE TEST REPORT  
VISIBLE EMISSIONS TESTING  
FROM  
PLANT 1  
FLORIDA FURNITURE INDUSTRIES  
722 RIVER STREET  
PALATKA, FLORIDA 32177

WOOD FIRED BOILER  
DUST COLLECTORS A AND B

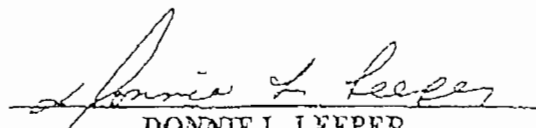
JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

1070002-AV

PREPARED FOR  
FLORIDA FURNITURE INDUSTRIES  
P.O. BOX 710  
PALATKA, FLORIDA

PREPARED BY  
ASTECH ENVIRONMENTAL SERVICES  
13170-58 ATLANTIC BLVD. SUITE 131  
JACKSONVILLE, FLORIDA 32225  
(904) 221-7174

  
DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9      203A      203B      Other \_\_\_\_\_

Company Name Florida Furniture  
 Facility Name Plant 1  
 Street Address 722 River Street  
 City PALATKA State FL Zip 32177

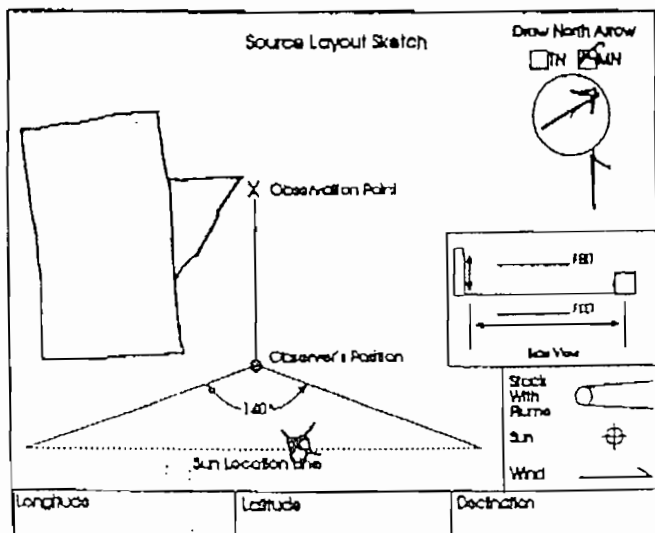
Process Dust collector Unit # A Operating Mode See Arch. data  
 Control Equipment baghouse Operating Mode continuous

Describe Emission Point 36" X 36" Square duct on side of baghouse  
 Height of Emis. Pt. Start 35' End Same Height of Emis. Pt. Rel. to Observer Start 30' End Same  
 Distance to Emis. Pt. Start 100' End Same Direction to Emis. Pt. (Degrees) Start 282° End Same

Vertical Angle to Obs. Pt. Start 10° End Same Direction to Obs. Pt. (Degrees) Start 282° End Same  
 Distance and Direction to Observation Point from Emission Point Start 100' - 282° End Same

Describe Emissions Start Clear End Same  
 Emission Color Start Clear End Same Water Droplet Plume Attached  Detached  None

Describe Plume Background Start SKY End Same  
 Background Color Start blue End Same Sky Conditions Start Mostly Cloudy End Same  
 Wind Speed Start 3-5 End Same Wind Direction Start ESE End Same  
 Ambient Temp. Start 60° End 60° Wet Bulb Temp. RH Percent



Form Number \_\_\_\_\_ Page \_\_\_\_\_ of \_\_\_\_\_  
 Continued on VEO Form Number \_\_\_\_\_

Sec Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
1	0	0	0	0	0814	0844	
2	0	0	0	0			
3	0	0	0	0			
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26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print) Donnie Leeper  
 Observer's Signature [Signature] Date 1-30-01  
 Organization ASTech Environmental Services  
 Certified by EPA Date 12-6-00

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 (Method 9) 205A 205B Other

Company Name *Florida Furniture Industries*  
 Facility Name *Plant 1*  
 Street Address *217 River Street*  
 City *Palatka* State *FL* Zip *32177*

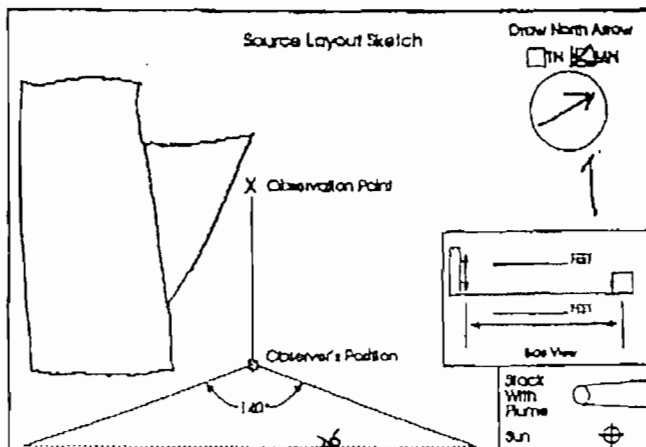
Process *Exst Collector* Unit *B* Operating Mode *See first data*  
 Control Equipment *Baghouse* Operating Mode *CONTINUOUS*

Describe Emission Point  
*36" x 36" SQUARE duct on side of baghouse*  
 Height of Emis. Pt. Start *~35'* End *SAME* Height of Emis. Pt. rel. to Observer Start *~30'* End *SAME*  
 Direction to Emis. Pt. Start *105'* End *SAME* Start *282°* End *SAME*

Vertical Angle to Obs. Pt. Start *105'* End *282°* Direction to Obs. Pt. (Degrees) Start *282°* End *SAME*  
 Distance and Direction to Observation Point from Emission Point Start *105' - 282°* End *SAME*

Describe Emissions  
 Start *Clear* End *SAME* Water Droplet Plume  
 Start *Clear* End *SAME* Attached  Detached  None

Describe Plume Background  
 Start *SKY* End *SAME* Sky Conditions *Cloudy*  
 Background Color Start *Blue* End *SAME* Start *Mostly* End *SAME*  
 Wind Speed Start *3-5* End *SAME* Wind Direction Start *ESE* End *SAME*  
 Ambient Temp. Start *60°* End *60°* Wet Bulb Temp. RH Percent



Longitude Latitude Declination

Additional Information

Form Number Page 1 of 1  
 Continued on VEO Form Number

Observation Date	Time Zone	Start Time	End Time					
<i>1-30-01</i>	<i>EST</i>	<i>0814</i>	<i>0844</i>	Sec				Comments
Mn	0	15	30	45				
1	0	0	0	0				
2	0	0	0	0				
3	0	0	0	0				
4	0	0	0	0				
5	0	0	0	0				
6	0	0	0	0				
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25	0	0	0	0				
26	0	0	0	0				
27	0	0	0	0				
28	0	0	0	0				
29	0	0	0	0				
30	0	0	0	0				

Observer's Name (Print) *Ronnie Leeper*  
 Observer's Signature *Ronnie Leeper* Date *1-30-01*  
 Organization *Asted Environmental Services*  
 Certified by *E.T.A.* Date *12-6-00*

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Donnie Leeper*

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

*Thomas Hore*

President

*Michael W. Lunsford*

Director of Training



**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Wood Fired Boiler fed by wood chips and sawdust from woodworking dust collection system (005) at Plant No. 3.</p>			
<p>4. Emissions Unit Identification Number: <span style="float: right;"><input type="checkbox"/> No ID</span> ID: 001 (Renumber to 004) <span style="float: right;"><input type="checkbox"/> ID Unknown</span></p>			
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date: 12/85</p>	<p>7. Emissions Unit Major Group SIC Code: 2511</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>Boiler provides steam to plant for drying ovens in the finish coating operation and for heating of the manufacturing facility.</p>			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Wood burning boiler fed by wood chips and sawdust with multi-cyclone Fly Ash Arrestor.

2. Control Device or Method Code(s): 076

**Emissions Unit Details**

1. Package Unit:	
Manufacturer: Hurst Firebox System	Model Number: -
2. Generator Nameplate Rating: N/A	MW
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	8.74	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	1,068 lb/hr	12.82 tons/day
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	Capacity based on original permitted rates.	

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? 004		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Boiler stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 35 feet	7. Exit Diameter: 1.8 feet	
8. Exit Temperature: 450 °F	9. Actual Volumetric Flow Rate: 3,700 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17                      East (km): 436.3                      North (km): 3283.6			
14. Emission Point Comment (limit to 200 characters): N/A			

**E. SEGMENT (PROCESS/FUEL) INFORMATION  
(All Emissions Units)**

**Segment Description and Rate:** Segment N/A of \_\_\_\_\_

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC): 1-02-009-06	3. SCC Units: tons burned	
4. Maximum Hourly Rate: 0.54	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0	8. Maximum % Ash: 0.6	9. Million Btu per SCC Unit: 16.37 mmbtu/ton
10. Segment Comment (limit to 200 characters):  N/A		

**Segment Description and Rate:** Segment N/A of \_\_\_\_\_

1. Segment Description (Process/Fuel Type ) (limit to 500 characters):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS**  
**(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO	076	N/A	NS
PM	076	N/A	NS
VOC	076	N/A	NS



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions N/A

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: N/A <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: Reference: Manufacturer's data.		7. Emissions Method Code:	
8. Calculation of Emissions (limit to 600 characters):			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_ N/A

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour                      tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:      20%      Exceptional Conditions:      40% Maximum Period of Excess Opacity Allowed:      2 min/hour Stack VE. Annual VE test. Any malfunction immediately reported.	
I. Method of Compliance: Boiler operators monitor equipment functions and stack VE. Annual VE test. Any malfunction immediately reported.	
5. Visible Emissions Comment (limit to 200 characters):  N/A	

**I. CONTINUOUS MONITOR INFORMATION**  
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

**Continuous Monitoring System:** Continuous Monitor N/A of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number:      Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION**  
**(Regulated Emissions Units Only)**

**Supplemental Requirements**

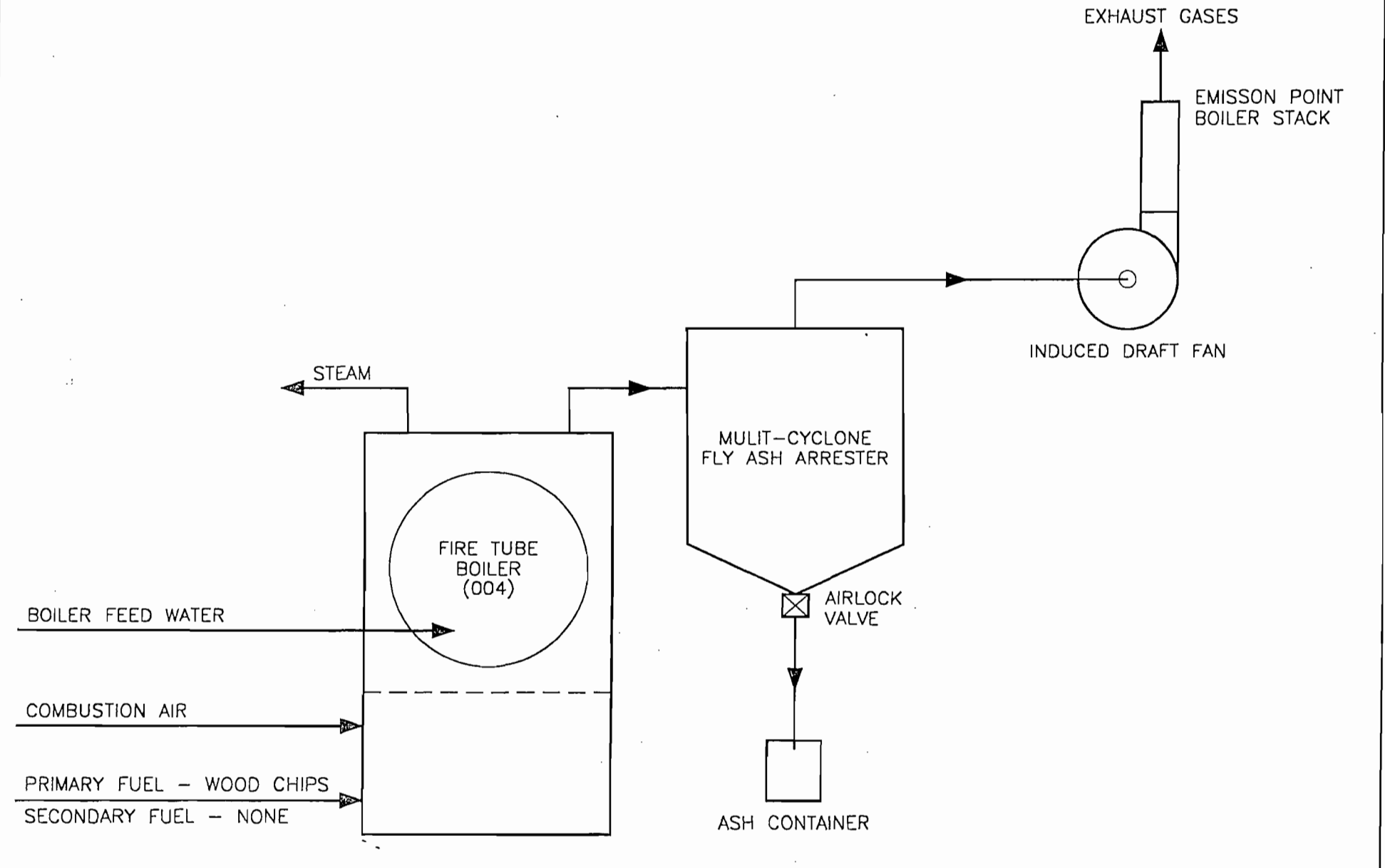
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>3E</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input checked="" type="checkbox"/> Attached, Document ID: <u>3F</u> <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:  <p style="text-align: center;">N/A</p>

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**EXHIBIT 3E**

**Wood Fired Boiler Process Flow Diagram**



MITTAUER & ASSOCIATES, INC.  
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.3, Document ID: 3E  
Palatka, Florida

**Exhibit 3F**

**Visible Emissions Testing for Wood Fired  
Boiler at Plant No. 3**

**SOURCE TEST REPORT**  
**VISIBLE EMISSIONS TESTING**  
**FROM**  
**PLANT 3**  
**FLORIDA FURNITURE INDUSTRIES**  
**160 COMFORT ROAD**  
**PALATKA, FLORIDA 32177**

**WOOD FIRED BOILER**  
**DUST COLLECTORS A,B,C AND D**

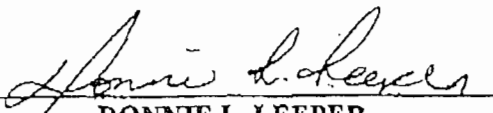
**JANUARY 30, 2001**

**TITLE V AIR PERMIT NUMBER**

**1070026-AV**

**PREPARED FOR**  
**FLORIDA FURNITURE INDUSTRIES**  
**P.O. BOX 710**  
**PALATKA, FLORIDA**

**PREPARED BY**  
**ASTECH ENVIRONMENTAL SERVICES**  
**13170-58 ATLANTIC BLVD. SUITE 131**  
**JACKSONVILLE, FLORIDA 32225**  
**(904) 221-7174**

  
**DONNIE L. LEEPER**



EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method A     203A     203B     Other \_\_\_\_\_

Company Name  
*Florida Furniture Industries*  
 Facility Name  
*Plant 3*  
 Street Address  
*760 Comfort Road*  
 City  
*PALMBA*    State  
*FL*    Zip  
*32177*

Process  
*Wood fired boiler*    Unit # \_\_\_\_\_    Operating Mode  
*See and data*  
 Control Equipment  
*N/A*    Operating Mode  
*N/A*

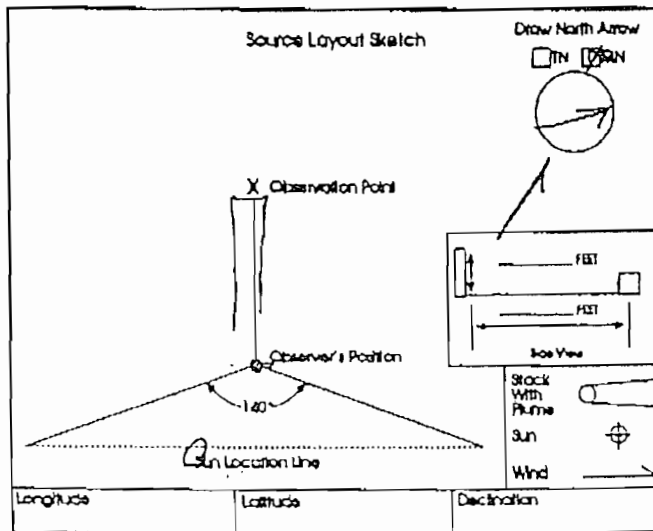
Describe Emission Point  
*15" Circular stack - black  
 in color*

Height of Emiss. Pt.  
 Start *30'*    End *Same*    Height of Emiss. Pt. Rel. to Observer  
 Start *30'*    End *Same*  
 Distance to Emiss. Pt.  
 Start *75'*    End *Same*    Direction to Emiss. Pt. (Degrees)  
 Start *285°*    End *Same*

Vertical Angle to Obs. Pt.  
 Start *27°*    End *Same*    Direction to Obs. Pt. (Degrees)  
 Start *285°*    End *Same*  
 Distance and Direction to Observation Point  
 from Emission Point  
 Start *125° - 285°*    End *Same*

Describe Emissions  
 Start *Heatwaves*    End *Same*  
 Emission Color  
 Start *Clear*    End *Same*    Water Droplet Plume  
 Attached     Detached     None

Describe Plume Background  
 Start *SM*    End *Same*  
 Background Color  
 Start *Grey*    End *Same*    Sky Conditions  
 Start *broken*    End *Same*  
 Wind Speed  
 Start *5-10*    End *Same*    Wind Direction  
 Start *SE*    End *Same*  
 Ambient Temp.  
 Start *65°*    End *65°*    Wet Bulb Temp.  
 RH Percent



Additional Information

Form Number \_\_\_\_\_ Page *1* of *1*  
 Continued on VEO Form Number \_\_\_\_\_

Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
1	0	0	0	0	<i>1005</i>	<i>1035</i>	
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
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18	0	0	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer (Full Name)  
*Hannie Leeper*  
 Observer Signature  
*Hannie Leeper*    Date  
*1-30-07*  
 Organization  
*Atch Environmental Services*  
 Certified by  
*E.T.A.*    Date  
*12-6-07*

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Donnie Leeper*

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

*Thomas Ford*

President

*Michael W. Langford*

Director of Training

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p>Wood dust collecting unit at Plant No. 3 consisting of 4 bag filter units.</p>			
<p>4. Emissions Unit Identification Number: <span style="float: right;"><input type="checkbox"/> No ID</span></p> <p>ID: 002 (renumber to 005) <span style="float: right;"><input type="checkbox"/> ID Unknown</span></p>			
<p>5. Emissions Unit Status Code:</p> <p style="text-align: center;">A</p>	<p>6. Initial Startup Date:</p> <p style="text-align: center;">12/85</p>	<p>7. Emissions Unit Major Group SIC Code:</p> <p style="text-align: center;">2511</p>	<p>8. Acid Rain Unit?</p> <p style="text-align: center;"><input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>Wood dust originates from the wood working area. This dust is pneumatically conveyed under vacuum to the dust silo via closed loop system. Air is filtered at Bag Filter units A, B, &amp; C. Bag Filters A &amp; B discharge to the atmosphere while Bag Filter C air is returned to the interior of the plant. Bag Filter D separates wood chips from the wood hog chipping operation.</p>			

**Emissions Unit Control Equipment**

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p><u>Bag Filter A at Plant No. 3</u></p> <p>Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.</p> <p>13.5' dia. Filter, 5,767 S.F. of filter area          448 Filter Bags, each 10' long          16 oz. Single Polyester Felt Filter Bags          99.96% efficiency @ 3 microns          Air to Cloth Ratio – 8.72=1  <u>Filtered Air – 50,287 cfm</u></p>
<p>2. Control Device or Method Code(s): 101</p>

**Emissions Unit Details**

<p>1. Package Unit:          Manufacturer: Pneumafil Corporation      Model Number: 13.5-448-10</p>
<p>2. Generator Nameplate Rating: N/A      MW</p>
<p>3. Incinerator Information: N/A</p> <p style="text-align: right;">Dwell Temperature:      °F</p> <p style="text-align: right;">Dwell Time:      seconds</p> <p style="text-align: right;">Incinerator Afterburner Temperature:      °F</p>

**Emissions Unit Control Equipment**

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p><u>Bag Filter B at Plant No. 3</u></p> <p>Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.</p> <p>13.5' dia. Filter, 5,767 S.F. of filter area          448 Filter Bags, each 10' long          16 oz. Single Polyester Felt Filter Bags          99.96% efficiency @ 3 microns          Air to Cloth Ratio - 9.49:1  <u>Filtered Air - 54,709 cfm</u></p>
<p>2. Control Device or Method Code(s): 101</p>

**Emissions Unit Details**

<p>1. Package Unit:          Manufacturer: Pneumafil Corporation      Model Number: 13.5-448-10</p>						
<p>2. Generator Nameplate Rating: N/A      MW</p>						
<p>3. Incinerator Information: N/A</p> <table style="width: 100%; margin-left: 150px;"> <tr> <td style="text-align: right;">Dwell Temperature:</td> <td style="text-align: right;">°F</td> </tr> <tr> <td style="text-align: right;">Dwell Time:</td> <td style="text-align: right;">seconds</td> </tr> <tr> <td style="text-align: right;">Incinerator Afterburner Temperature:</td> <td style="text-align: right;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**Emissions Unit Control Equipment**

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p><u>Bag Filter C at Plant No. 3</u></p> <p>Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.</p> <p>13.5' dia. Filter, 5,922 S.F. of filter area          448 Filter Bags, each 10' long          16 oz. Single Polyester Felt Filter Bags          99.96% efficiency @ 3 microns          Air to Cloth Ratio – 9.15:1  <u>Filtered Air – 54,200 cfm</u></p>
<p>2. Control Device or Method Code(s): 101</p>

**Emissions Unit Details**

<p>1. Package Unit:          Manufacturer: Pneumafil Corporation      Model Number: 13.5-448-10</p>
<p>2. Generator Nameplate Rating: N/A      MW</p>
<p>3. Incinerator Information: N/A</p> <p style="text-align: right;">Dwell Temperature:      °F</p> <p style="text-align: right;">Dwell Time:      seconds</p> <p style="text-align: right;">Incinerator Afterburner Temperature:      °F</p>

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter D at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 3,325 S.F. of filter area  
 448 Filter Bags, each 10' long  
 16 oz. Single Polyester Felt Filter Bags  
 99.96% efficiency @ 3 microns  
 Air to Cloth Ratio – 7.5:1  
Filtered Air – 24,500 cfm

2. Control Device or Method Code(s): 101

**Emissions Unit Details**

1. Package Unit:	
Manufacturer: Pneumafil Corporation	Model Number: -
2. Generator Nameplate Rating: N/A MW	
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	6,958 lb/hr (total all 4 units)	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	<p>Total capacity of 6,958 lb/hr as per phone conversation with Chas Campbell of Clean Air Systems, Statesville, NC, (704) 873-9998.</p>	



**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

**List of Applicable Regulations**

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

**D. EMISSION POINT (STACK/VENT) INFORMATION**  
**(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? 005		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. Clean air discharge point on Bag Filter A at Plant No. 3. 2. Clean air discharge point on Bag Filter B at Plant No. 3. 3. Clean air return to plant on Bag Filter C at Plant No. 3. 4. Closed loop return line on Bag Filter D at Plant No. 3.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
5. Discharge Type Code: Filters A & B = V Filters C & D = P		6. Stack Height: Filters A, B, & C = 26 feet Filter D = 24 feet	
		7. Exit Diameter: Filters A, B, & C = 3.8 feet Filter D = 3.3 feet	
8. Exit Temperature: All Filters = 77°F		9. Actual Volumetric Flow Rate: Filter A = 50,287 Filter B = 54,709 acfm Filter C = 54,200 acfm Filter D = 24,500 acfm	
		10. Water Vapor:  N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.4 North (km): 3283.4			
14. Emission Point Comment (limit to 200 characters):  N/A			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
**(All Emissions Units)**

**Segment Description and Rate:** Segment N/A of \_\_\_\_\_

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC):		3. SCC Units: tons burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: mmbtu/ton
10. Segment Comment (limit to 200 characters):		

**Segment Description and Rate:** Segment N/A of \_\_\_\_\_

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions N/A**

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control: 99.96	
3. Potential Emissions: 2.78 lb/hour		4. Synthetically Limited? [ ] 12.19 tons/year	
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 to _____ tons/year			
6. Emission Factor: Reference: Manufacturer's data.		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters):  Max process rate = 6,958 lb/hr Emission Factor = 0.04% (6,958 lb/hr)(0.04%) = 2.78 lb/hr 2.78 lb/hr x 8,760 hr/yr / 2000 lb/ton = 12.19 ton/yr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  N/A			

**Allowable Emissions Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_ N/A**

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:      20%      Exceptional Conditions:      N/A% Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: Testing of VE at minimum of 90% of operating rate.	
5. Visible Emissions Comment (limit to 200 characters):  N/A	

**I. CONTINUOUS MONITOR INFORMATION**  
 (Only Regulated Emissions Units Subject to Continuous Monitoring)

**Continuous Monitoring System:** Continuous Monitor N/A of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number:      Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>3D</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input checked="" type="checkbox"/> Attached, Document ID: <u>3G</u> <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:  <p style="text-align: center;">N/A</p>

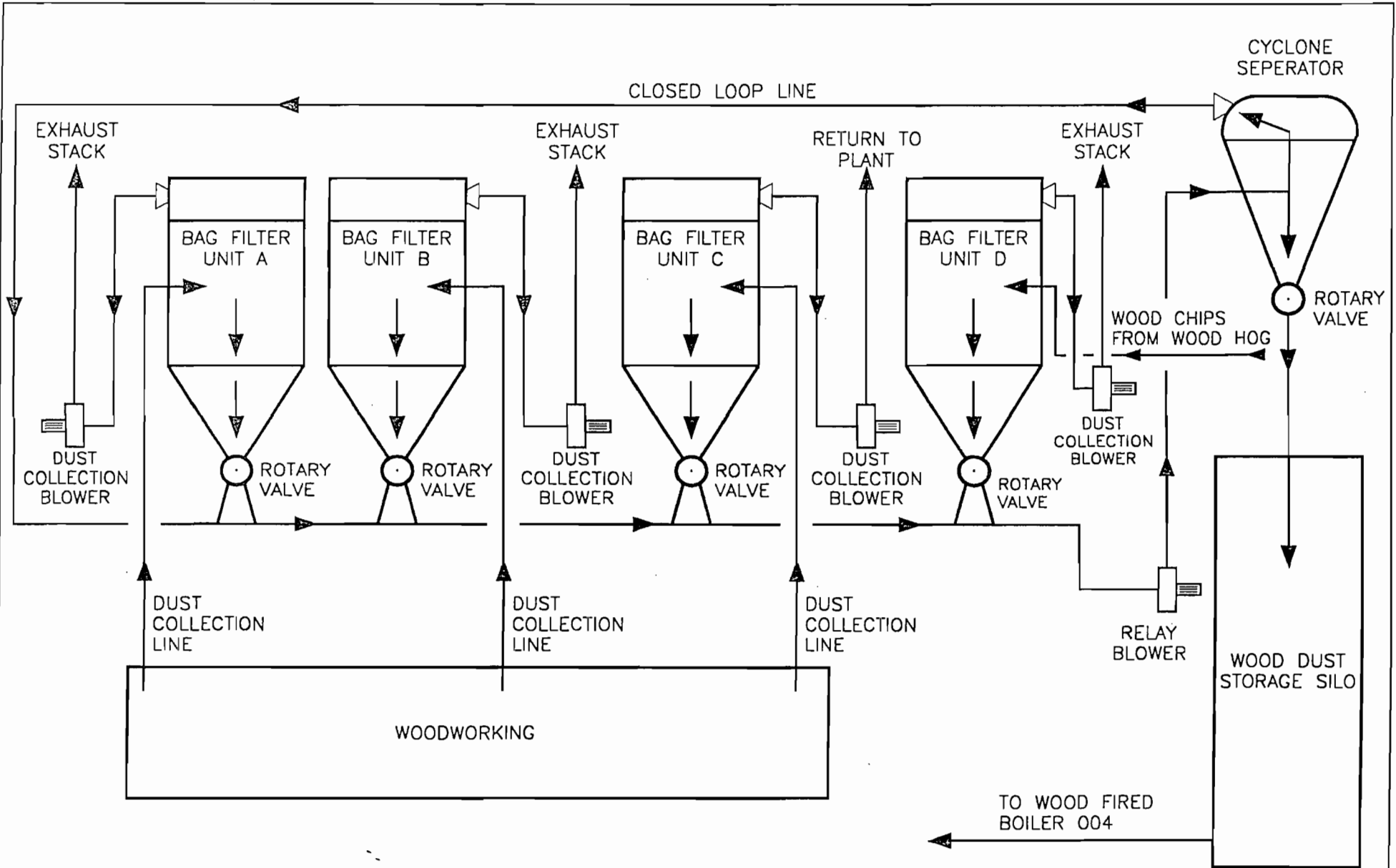


**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**EXHIBIT 3D**

**Woodworking Dust Collection Flow Diagram**



MITTAUER & ASSOCIATES, INC.  
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Woodworking Dust Collection Flow Diagram  
Florida Furniture Industries, Inc.  
Plant No.3, Document ID: 3D  
Palatka, Florida

**Exhibit 3G**

**Visible Emissions Testing for Wood Dust  
Collection at Plant No. 3**

SOURCE TEST REPORT  
VISIBLE EMISSIONS TESTING

FROM

PLANT 3  
FLORIDA FURNITURE INDUSTRIES  
160 COMFORT ROAD  
PALATKA, FLORIDA 32177

WOOD FIRED BOILER  
DUST COLLECTORS A,B,C AND D

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

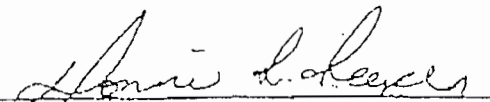
1070026-AV

PREPARED FOR

FLORIDA FURNITURE INDUSTRIES  
P.O. BOX 710  
PALATKA, FLORIDA

PREPARED BY

ASTECH ENVIRONMENTAL SERVICES  
13170-58 ATLANTIC BLVD. SUITE 131  
JACKSONVILLE, FLORIDA 32225  
(904) 221-7174

  
DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9  203A  203B  Other: \_\_\_\_\_

Company Name: Florida Furniture Industries  
 Facility Name: Plant 3  
 Street Address: 160 Comfort Road  
 City: PALM BEACH State: FL Zip: 33477

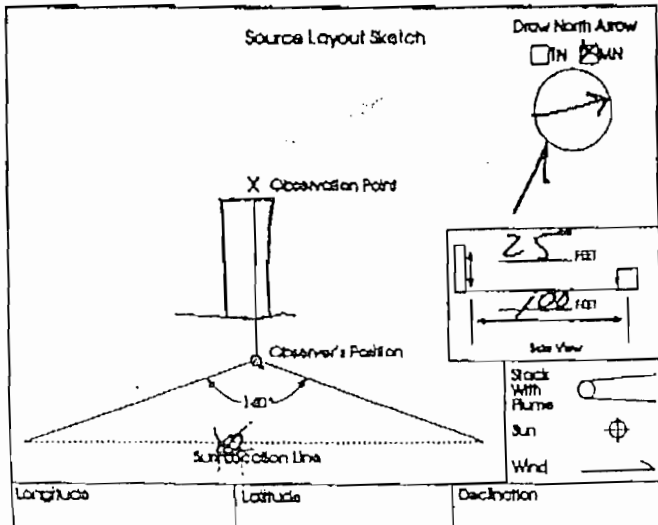
Process: Dust collector Unit #: A Operating Mode: See Prod. data  
 Control Equipment: Baghouse Operating Mode: CONTINUOUS

Describe Emission Point:  
36" galvanized steel (circular)  
 Height of Emiss. Pt.: Start ~25' End Same Height of Emiss. Pt. Rel. to Observer: Start ~25' End Same  
 Distance to Emiss. Pt.: Start ~100' End Same Direction to Emiss. Pt. (Diag. deg): Start 264° End Same

Vertical Angle to Obs. Pt.: Start 21 End Same Direction to Obs. Pt. (Degrees): Start 264° End Same  
 Distance and Direction to Observation Point from Emission Point: Start 100' - 264° End Same

Describe Emissions:  
 Start Clear End Same Water Droplet Plume:  Attached  Detached  None   
 Emission Color: Start Clear End Same

Describe Plume Background:  
 Start sky End Same Sky Conditions: Start broken End Same  
 Background Color: Start grey End Same Wind Direction: Start SE End Same  
 Wind Speed: Start 5-10 mph End Same Ambient Temp.: Start 65° End 65° Wet Bulb Temp.: \_\_\_\_\_ RH Percent: \_\_\_\_\_



Additional Information

Form Number: \_\_\_\_\_ Page: 1 of 1  
 Continued on VEO Form Number: \_\_\_\_\_

Min	Observation Date: <u>1-30-01</u> Time Zone: <u>EST</u> Start Time: <u>1005</u> End Time: <u>1035</u>				Comments
	Sec	0	15	30	
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
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10	0	0	0	0	
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25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print): Bonnie Leeper  
 Observer's Signature: Bonnie Leeper Date: 1-30-01  
 Organization: Astech Environmental Services  
 Certified by: EST.A. Date: 12-6-00

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9    203A    203B    Other \_\_\_\_\_

Company Name  
 Florida Furniture Industries  
 Facility Name  
 Plant 3  
 Street Address  
 1100 Comfort Road  
 City  
 PALATKA    State FL    Zip 32177

Process  
 Dust Collector    Unit B    Operating Mode  
 See And. data  
 Control Equipment  
 Baghouse    Operating Mode  
 Continuous

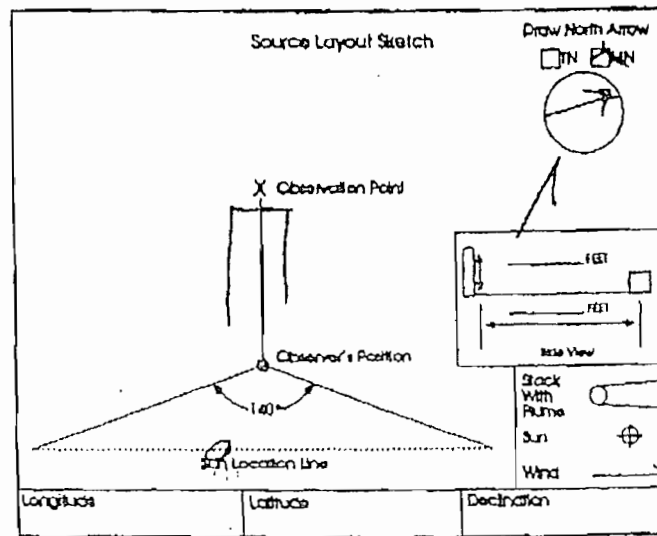
Describe Emission Point  
 36" circular galvanized stack

Height of Emis. Pt.  
 Start 30'    End Same    Height of Emis. Pt. Rel. to Observer  
 Start 30'    End Same  
 Distance to Emis. Pt.  
 Start 110'    End Same    Direction to Emis. Pt. (Degrees)  
 Start 276°    End Same

Vertical Angle to Obs. Pt.  
 Start 21°    End Same    Direction to Obs. Pt. (Degrees)  
 Start 276°    End Same  
 Distance and Direction to Observation Point from Emission Point  
 Start 110' - 276°    End Same

Describe Emissions  
 Start Clear    End Same  
 Emission Color  
 Start Clear    End Same    Water Droplet Plume  
 Attached  Detached  None

Describe Plume Background  
 Start Sky    End Same  
 Background Color  
 Start grey    End Same    Sky Conditions  
 Start broken    End Same  
 Wind Speed  
 Start 5-10    End Same    Wind Direction  
 Start SE    End Same  
 Ambient Temp.  
 Start 65°    End 65°    Wet Bulb Temp.  
 RH Percent



Additional Information

Form Number \_\_\_\_\_ Page 1 of 1  
 Continued on VEO Form Number \_\_\_\_\_

Observation Date	Time Zone	Start Time	End Time	Comments
1-30-01	EST	1005	1035	
1	0	0	0	
2	0	0	0	
3	0	0	0	
4	0	0	0	
5	0	0	0	
6	0	0	0	
7	0	0	0	
8	0	0	0	
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11	0	0	0	
12	0	0	0	
13	0	0	0	
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25	0	0	0	
26	0	0	0	
27	0	0	0	
28	0	0	0	
29	0	0	0	
30	0	0	0	

Observer's Name (Print)  
 Donnie Leary  
 Observer's Signature  
 Donnie Leary    Date 1-30-01  
 Organization  
 First Environmental Service  
 Certified By  
 F.T.A.    Date 1/30/01

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 203A     203B     Other: \_\_\_\_\_

Company Name  
 Florida Furniture Industries  
 Facility Name  
 Plant 3  
 Street Address  
 160 Comfort Road  
 City  
 PALATKA    State  
 FL    Zip  
 32117

Process  
 Dust collector    Unit #  
 C    Operating Mode  
 See Prod Data  
 Control Equipment  
 BAHouse    Operating Mode  
 Continuous

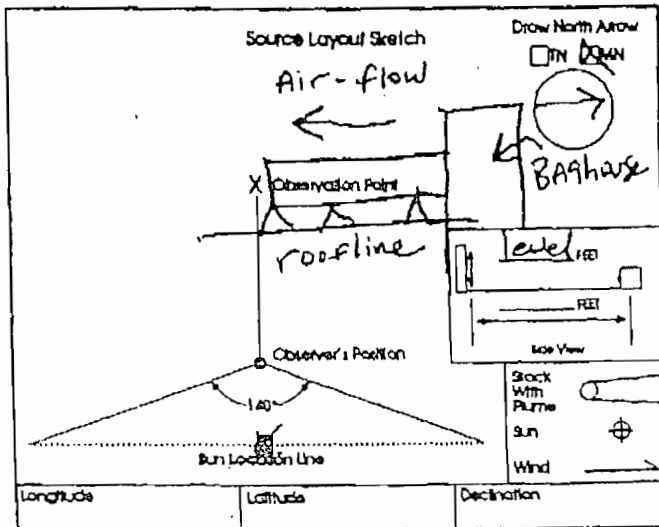
Describe Emission Point  
 36" x 36" square

duct  
 Height of Emis. Pt.  
 Start level    End Same  
 Height of Emis. Pt. Asl. to Observer  
 Start level    End Same  
 Distance to Emis. Pt.  
 Start 50'    End Same    Direction to Emis. Pt. (Degrees)  
 Start 270°    End Same

Vertical Angle to Obs. Pt.  
 Start level    End Same    Direction to Obs. Pt. (Degrees)  
 Start 270°    End Same  
 Distance and Direction to Observation Point from Emission Point  
 Start 50' - 270°    End Same

Describe Emissions  
 Start Clear    End Same  
 Emission Color  
 Start Clear    End Same    Water Droplet Plume  
 Attached  Detached  None

Describe Plume Background  
 Start SKY    End Same  
 Background Color  
 Start grey    End Same    Sky Conditions  
 Start broken in    End Same  
 Wind Speed  
 Start 5-10    End Same    Wind Direction  
 Start UAR    End Same  
 Ambient Temp.    Wet Bulb Temp.    RH Percent



Longitude    Latitude    Declination

Additional Information

Form Number    Page    of  
 Continued on VEO Form Number

Sec Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
7-30-01	EST				1040	1110	
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
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20	0	0	0	0			
21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print)  
 Donnie Leeper  
 Observer's Signature  
 Donnie Leeper    Date  
 1-30-01  
 Organization  
 Airtech Environmental Services  
 Certified by  
 E.T.A.    Date  
 12-16-05



EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One) Method 9 200A 200B Other \_\_\_\_\_

Company Name Florida Furniture Industries  
 Facility Name Plant 3  
 Street Address 160 Comfort Road  
 City PALATKA State FL Zip 32177

Process Dust Collector Unit D Operating Mode See Prod. data  
 Control Equipment BAGhouse Operating Mode Continuous

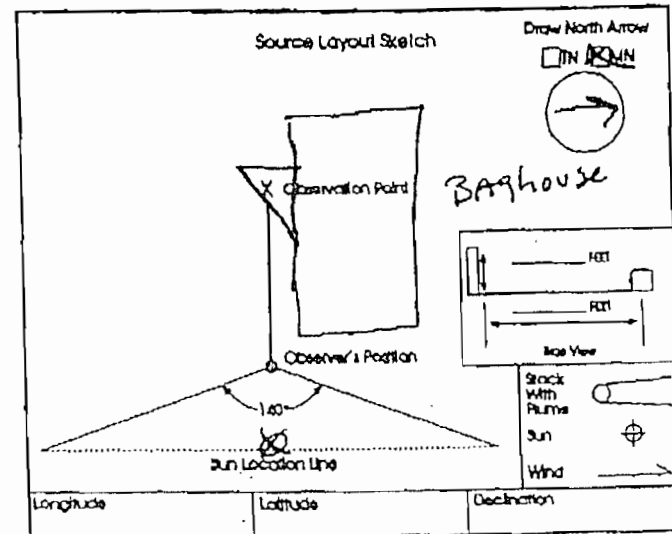
Describe Emission Point 36" x 36" duct on side of BAGhouse

Height of Emiss. Pt. Start 25' End Same Height of Emiss. Pt. Rel. to Observer Start level End Same  
 Distance to Emiss. Pt. Start 75' End Same Direction to Emiss. Pt. (Degrees) Start 280° End Same

Vertical Angle to Obs. Pt. Start level End Same Direction to Obs. Pt. (Degrees) Start 280° End Same  
 Distance and Direction to Observation Point from Emission Point Start 75' - 280° End Same

Describe Emissions Start Clear End Same Emission Color Start Clear End Same Water Droplet Plume Attached  Detached  None

Describe Plume Background Start sky End Same Background Color Start gray End Same Sky Conditions Start broken End Same  
 Wind Speed Start 5-10 End Same Wind Direction Start Variable End Same  
 Ambient Temp. \_\_\_\_\_ Wet Bulb Temp. \_\_\_\_\_ RH Percent \_\_\_\_\_



Additional Information \_\_\_\_\_

Form Number \_\_\_\_\_ Page 1 of 1  
 Continued on VEO Form Number \_\_\_\_\_

Sec Min	Time Zone				Start Time	End Time	Comments
	0	15	30	45			
1	0	0	0	0	1040	1110	
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
17	0	0	0	0			
18	0	0	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print) Donnie Leeper  
 Observer's Signature Donnie Leeper Date 1-30-01  
 Organization AsTech Environmental Services  
 Conducted by \_\_\_\_\_ Date \_\_\_\_\_

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

*Donnie Leeper*

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

*Thomas Hore*

President

*Michael W. Jansford*

Director of Training

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p>Finish coating operation at Plant No. 3.</p>			
<p>4. Emissions Unit Identification Number: ID: 003 (to be renumbered to 006)</p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date: 12/85</p>	<p>7. Emissions Unit Major Group SIC Code: 2511</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>Wood parts are coated in spray booths using air, airless, air assisted or HVLP spray where possible. Also, print coating, dip coating and hand pad staining takes place. Finished product is dried in steam heated ovens in the Finishing Room.</p>			



**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	<u>240</u>	Furniture Units/hr
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	8 hours/day	5 days/week
	52 weeks/year	1,926.5 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<u>VOC Emissions from Finish Coating Operations</u>		
1999: Plant Nos. 1 & 3 combined = 378.30 tons = 756,608.8 lbs		
2000: Plant Nos. 1 & 3 combined = 364.79 tons = 729,570.3 lbs		
Average hours of operation for Plant Nos. 1 & 3 in 1999 = 1925 hrs		
Average hours of operation for Plant Nos. 1 & 3 in 2000 = 1928 hrs		
Average hourly emissions rate = $\frac{378.30 \text{ tons} + 364.79 \text{ tons}}{1925 \text{ hrs} + 1928 \text{ hrs}} = 0.1929 \text{ tons/hr}$		
(371.55 tons/yr)(0.1929 tons/hr) = 1926 hrs/yr		

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

**List of Applicable Regulations**

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? 006		2. Emission Point Type Code: 3, 4	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  No VE			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
5. Discharge Type Code: F,V	6. Stack Height: Spray Booth = 27 feet Ovens = 24 feet	7. Exit Diameter: Spray Booths 1-6 = 2.0 feet Spray Booth 7 = 2.5 feet Ovens = 1.3 feet	
8. Exit Temperature: Spray Booths = 77°F Ovens = 125°F	9. Actual Volumetric Flow Rate: (See Field 14) acfm	10. Water Vapor:  N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Fugitive Sources = 4 feet	
13. Emission Point UTM Coordinates:  Zone: 17                      East (km): 436.4                      North (km): 3283.4			
14. Emission Point Comment (limit to 200 characters): Spray Booth No. 1 – 26,000 cfm Spray Booth No. 2 – 26,000 cfm Spray Booth No. 3 – 26,000 cfm Spray Booth No. 4 – 26,000 cfm Spray Booth No. 5 – 26,000 cfm Spray Booth No. 6 – 26,000 cfm Spray Booth No. 7 – 13,500 cfm Oven No. 1 – 1,000 cfm Oven No. 2 – 1,000 cfm Oven No. 3 – 750 cfm Oven No. 4 – 750 cfm Oven No. 5 – 750 cfm			



**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment \_\_\_\_\_ of \_\_\_\_\_

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  N/A – Steam heat is generated by Wood Fired Boiler (004).		
2. Source Classification Code (SCC): N/A		3. SCC Units: N/A tons burned
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A mmbtu/ton
10. Segment Comment (limit to 200 characters):  N/A		

**Segment Description and Rate:** Segment N/A of \_\_\_\_\_

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

**F. EMISSIONS UNIT POLLUTANTS**  
**(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	N/A	N/A	EL
H085	N/A	N/A	NS
H096	N/A	N/A	NS
H115	N/A	N/A	NS
H120	N/A	N/A	NS
H169	N/A	N/A	NS
H186	N/A	N/A	NS

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control: 0
3. Potential Emissions: 385.7 lb/hour      371.55 tons/year	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: N/A [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 378.30 tons = 756,608.8 lbs 2000: Plant Nos. 1 & 3 combined = 364.79 tons = 729,570.3 lbs Average total VOC Emissions for 1999/2000 = 743,089.6 lbs = 371.55 tons Average hours of operation for 1999/2000 = 1926.5 hrs 371.55 tons / 1926.5 hrs = 0.1929 tons/hr = 385.7 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  VOC emission rates include pollutants which are listed as both VOC and HAP.	

Allowable Emissions Allowable Emissions 1 of 7

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: 8/1/01
3. Requested Allowable Emissions and Units: 371.55 tons/yr	4. Equivalent Allowable Emissions: 385.7 lb/hour      371.55 tons/year
5. Method of Compliance (limit to 60 characters): Tracking of VOC emissions using REGMET 6.0 based on chemical usage.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  N/A	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H085		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 9.386 lb/hour		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: N/A <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 9,783.5 lbs + 7,995.7 lbs = 17,779.2 lbs = 8.89 tons 2000: Plant Nos. 1 & 3 combined = 9,610.5 lbs + 8,775.5 lbs = 18,386.0 lbs = 9.19 tons Average H085 emissions for 1999/2000 = 18,082.6 lbs = 9.041 tons Average hours of operation for 1999/2000 = 1926.5 hrs 18,082.6 lbs / 1926.5 hrs = 9.386 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <i>Ethyl</i> Ethyl Benzene included in VOC total.			

Allowable Emissions Allowable Emissions N/A of \_\_\_\_\_

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions:	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions N/A**

1. Pollutant Emitted: H096		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 5.544 lb/hour		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: N/A <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		7. Emissions Method Code: 2	
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 6,615.0 lbs + 4,731.6 lbs = 11,346.6 lbs = 5.673 tons 2000: Plant Nos. 1 & 3 combined = 5,725.9 lbs + 4,290.2 lbs = 10,016.1 lbs = 5.008 tons Average H096 emissions for 1999/2000 = 10,681.4 lbs = <b>5.341 tons</b> Average hours of operation for 1999/2000 = 1926.5 hrs 10,681.4 lbs / 1926.5 hrs = 5.544 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  Glycol ethers included in VOC total.			

**Allowable Emissions** Allowable Emissions N/A of \_\_\_\_\_

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour      tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions** N/A

1. Pollutant Emitted: H115		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 0.9042 lb/hour		4. Synthetically Limited? [ ] 0.7000 tons/year	
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 645.1 lbs + 412.3 lbs = 1,057.4 lbs = 0.5287 tons 2000: Plant Nos. 1 & 3 combined = 839.7 lbs + 902.3 lbs = 1,742.0 lbs = 0.8710 tons Average H115 emissions for 1999/2000 = 1,399.7 lbs = <b>0.7000 tons</b> Average hours of operation for 1999/2000 = 1926.5 hrs 1,742.0 lbs / 1926.5 hrs = 0.9042 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <b>Methanol</b> included in VOC total.			

**Allowable Emissions** Allowable Emissions N/A of \_\_\_\_\_

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions** N/A

1. Pollutant Emitted: H120		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 0.7266 lb/hour		4. Synthetically Limited? [ ] 0.6999 tons/year	
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 407.2 lbs + 431.0 lbs = 838.2 lbs = 0.4191 tons 2000: Plant Nos. 1 & 3 combined = 840.4 lbs + 1,120.8 lbs = 1,961.2 lbs = 0.9806 tons Average H120 emissions for 1999/2000 = 1,399.7 lbs = <b>0.6999 tons</b> Average hours of operation for 1999/2000 = 1926.5 hrs 1,399.7 lbs / 1926.5 hrs = 0.7266 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <b>Methyl ethyl ketone</b> included in VOC total.			

**Allowable Emissions** Allowable Emissions N/A of \_\_\_\_\_

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions** N/A

1. Pollutant Emitted: H169	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 17.69 lb/hour	4. Synthetically Limited? [ ] 17.04 tons/year
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 19,686.4 lbs + 15,476.6 lbs = 35,163.0 lbs = 17.58 tons 2000: Plant Nos. 1 & 3 combined = 18,362.5 lbs + 14,616.4 lbs = 32,978.9 lbs = 16.49 tons Average H169 emissions for 1999/2000 = 34,071.0 lbs = <b>17.04 tons</b> Average hours of operation for 1999/2000 = 1926.5 hrs 34,071.0 lbs / 1926.5 hrs = 17.69 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <i>Toluene</i> <b>Toluene</b> included in VOC total.	

**Allowable Emissions** Allowable Emissions N/A of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions** N/A

1. Pollutant Emitted: H186	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 40.48 lb/hour	4. Synthetically Limited? [ ] 38.99 tons/year
5. Range of Estimated Fugitive Emissions: N/A [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters):  1999: Plant Nos. 1 & 3 combined = 41,942.7 lbs + 34,605.1 lbs = 76,547.8 lbs = 38.27 tons 2000: Plant Nos. 1 & 3 combined = 41,351.2 lbs + 38,064.1 lbs = 79,415.3 lbs = 39.71 tons Average H186 emissions for 1999/2000 = 77,981.6 lbs = <b>38.99 tons</b> Average hours of operation for 1999/2000 = 1926.5 hrs 77,981.6 lbs / 1926.5 hrs = 40.48 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): <i>Xylenes</i> <b>Xylenes</b> included in VOC total.	

**Allowable Emissions** Allowable Emissions N/A of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

