FLORIDA DEP LOGO

Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

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

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: ***Florida Furniture Industries, Inc.***	
2. Site Name: ***Plant No. 1***	
3. Facility Identification Number: ***31JAX54000201***	[ ] Unknown
4. Facility Location: Street Address or Other Locator: ***722 River Street*** City: ***Palatka*** County: ***Putnam*** Zip Code: ***32177***	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	June 11, 1996
2. Permit Number:	1070002-001-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

F. H. Rion, Jr., Vice President/General Manager

2. Owner/Authorized Representative or Responsible Official Mailing Address:

Organization/Firm: ***Florida Furniture Industries, Inc.***
Street Address: ***P. O. Box 610***
City: ***Palatka*** State: ***Florida*** 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, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., 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.*

F. H. Rion Jr.
Signature

June 10, 1996
Date

* Attach letter of authorization if not currently on file.

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID	Description of Emissions Unit	Permit Type
DK1	*Dry Kiln No. 1, 2 & 3*	*AF2C*
WD1	*Woodworking Dust Collection*	*AF2C*
FC1	*Finish Coating Operations*	*AF2C*
B1	*Wood Fired Boiler*	*AF2C*

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

[*X*] Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

[ ] Initial air operation permit under Chapter 62-213, F.A.C., 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: _____

[ ] Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

[ ] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

[ ] Air operation permit revision for a Title V source 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 to be revised: _____

Reason for revision: _____

_____

N/A **Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.**

This Application for Air Permit is submitted to obtain:

[ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

_____

[ ] Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

[ ] Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

_____

N/A **Category III: All Air Construction Permit Applications for All Facilities and Emissions Units**

This Application for Air Permit is submitted to obtain:

[ ] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: _____

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

[*X*] Attached - Amount: $ *5,000.00* [ ] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations: *N/A*
2. Projected or Actual Date of Commencement of Construction: *N/A*
3. Projected Date of Completion of Construction: *N/A*

Professional Engineer Certification

1. Professional Engineer Name: ***Joseph A. Mittauer, P.E.*** Registration Number: ***23111***
2. Professional Engineer Mailing Address: Organization/Firm: ***Mittauer & Associates, Inc.*** Street Address: ***1202 Kingsley Avenue*** City: ***Orange Park*** State: ***Florida*** Zip Code: ***32073***
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 [**X**] 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.

June 10, 1996

Signature Date

(seal)

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact:

Joseph A. Mittauer, P.E., President

2. Application Contact Mailing Address:

Organization/Firm: ***Mittauer & Associates, Inc.***
Street Address: ***1202 Kingsley Avenue***
City: ***Orange Park*** State: ***Florida*** Zip Code: ***32073***

3. Application Contact Telephone Numbers:
Telephone: ***(904) 278-0030*** Fax: ***(904) 278-0840***

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*			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): *29°-38'-25"N* Longitude (DD/MM/SS): *81°-38'-15"W*			
3. Governmental Facility Code: *0*	4. Facility Status Code: *A*	5. Facility Major Group SIC Code: *25*	6. Facility SIC(s): *2511*
7. Facility Comment (limit to 500 characters): ***Florida Furniture Industries, Inc. manufactures wood bedroom furniture.***			

Facility Contact

1. Name and Title of Facility Contact: ***Kenneth G. Loyless, Safety Director***
2. Facility Contact Mailing Address: Organization/Firm: ***Florida Furniture Industries, Inc.*** Street Address: ***P. O. Box 610*** City: ***Palatka*** State: ***Florida*** Zip Code: ***32178***
3. Facility Contact Telephone Numbers: Telephone: ***(904) 328-3444*** Fax: ***(904) 328-6011***

Facility Regulatory Classifications

1. Small Business Stationary Source?	[ ] Yes [X] No [ ] Unknown
2. Title V Source?	[X] Yes [ ] No
3. Synthetic Non-Title V Source?	[ ] Yes [X] No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	[X] Yes [ ] No
5. Synthetic Minor Source of Pollutants Other than HAPs?	[ ] Yes [X] No
6. Major Source of Hazardous Air Pollutants (HAPs)?	[X] Yes [ ] No
7. Synthetic Minor Source of HAPs?	[ ] Yes [X] No
8. One or More Emissions Units Subject to NSPS?	[ ] Yes [X] No
9. One or More Emission Units Subject to NESHAP?	[X] Yes [ ] No
10. Title V Source by EPA Designation?	[X] Yes [ ] No
11. Facility Regulatory Classifications Comment (limit to 200 characters): *N/A*	

B. FACILITY REGULATIONS

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

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 Emissions 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.: Operation Permit for New Sources.	*62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.*

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. Continued.)

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.	
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) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.	
CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION 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)(c), F.A.C.: Unconfined Emissions of Particulate Matter	

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
CO	B
NOX	B
PM	B
PM10	B
SO2	B
VOC	A
H046	B
H047	B
H053	B
H060	B
H066	B
H085	A
H095	B
H096	A
H113	B
H115	A
H120	B
H123	B
H132	B
H169	A
H182	B
H186	A

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information: Pollutant *N/A* of *N/A*

1. Pollutant Emitted: *N/A*		
2. Requested Emissions Cap: *N/A*	(lb/hour)	(tons/year) *N/A*
3. Basis for Emissions Cap Code: *N/A*		
4. Facility Pollutant Comment (limit to 400 characters): *N/A*		

Facility Pollutant Detail Information: Pollutant *N/A* of *N/A*

1. Pollutant Emitted: **N/A**		
2. Requested Emissions Cap: *N/A*	(lb/hour)	(tons/year) *N/A*
3. Basis for Emissions Cap Code: *N/A*		
4. Facility Pollutant Comment (limit to 400 characters): *N/A*		

E. FACILITY SUPPLEMENTAL INFORMATION

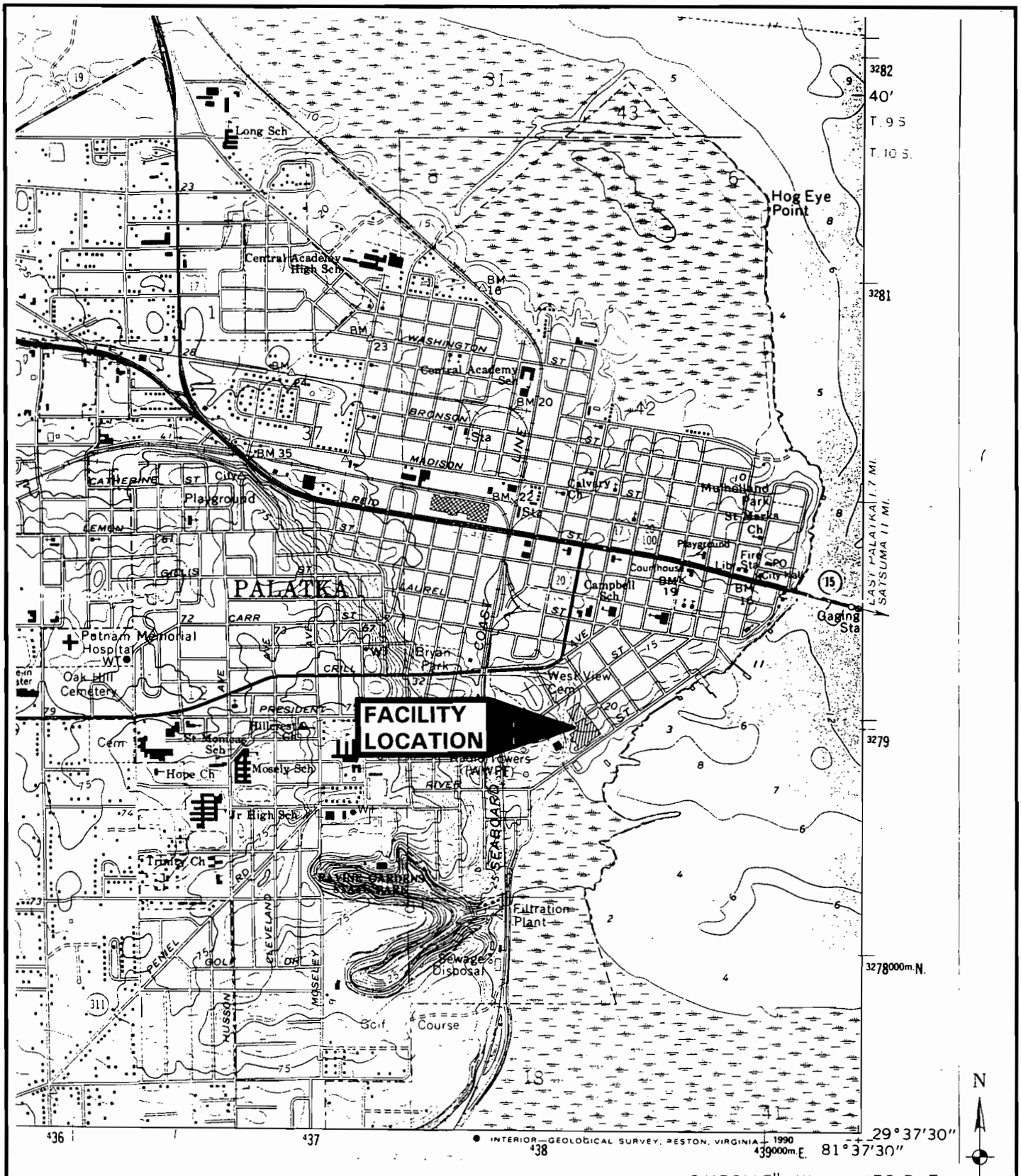
Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: [*X*] Attached, Document ID: *1A* [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [*X*] Attached, Document ID: *1B* [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [*X*] Attached, Document ID: *1C* [ ] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [*X*] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [ ] Attached, Document ID:_____ [*X*] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [ ] Attached, Document ID:_____ [*X*] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities: [ ] Attached, Document ID:_____ [*X*] Not Applicable
8. List of Equipment/Activities Regulated under Title VI: [ ] Attached, Document ID:_____ [*X*] Equipment/Activities On site but Not Required to be Individually Listed [ ] Not Applicable
9. Alternative Methods of Operation: [ ] Attached, Document ID:_____ [*X*] Not Applicable
10. Alternative Modes of Operation (Emissions Trading): [ ] Attached, Document ID:_____ [*X*] Not Applicable

11. Identification of Additional Applicable Requirements: [ ] Attached, Document ID:_____ [X] Not Applicable
12. Compliance Assurance Monitoring Plan: [ ] Attached, Document ID:_____ [X] Not Applicable
13. Risk Management Plan Verification: [ ] Plan Submitted to Implementing Agency - Verification Attached, Document ID:_____ [ ] Plan to be Submitted to Implementing Agency by Required Date [X] Not Applicable
14. Compliance Report and Plan: [ ] Attached, Document ID:_____ [X] Not Applicable
15. Compliance Certification (Hard-copy Required): [ ] Attached, Document ID:_____ [X] Not Applicable



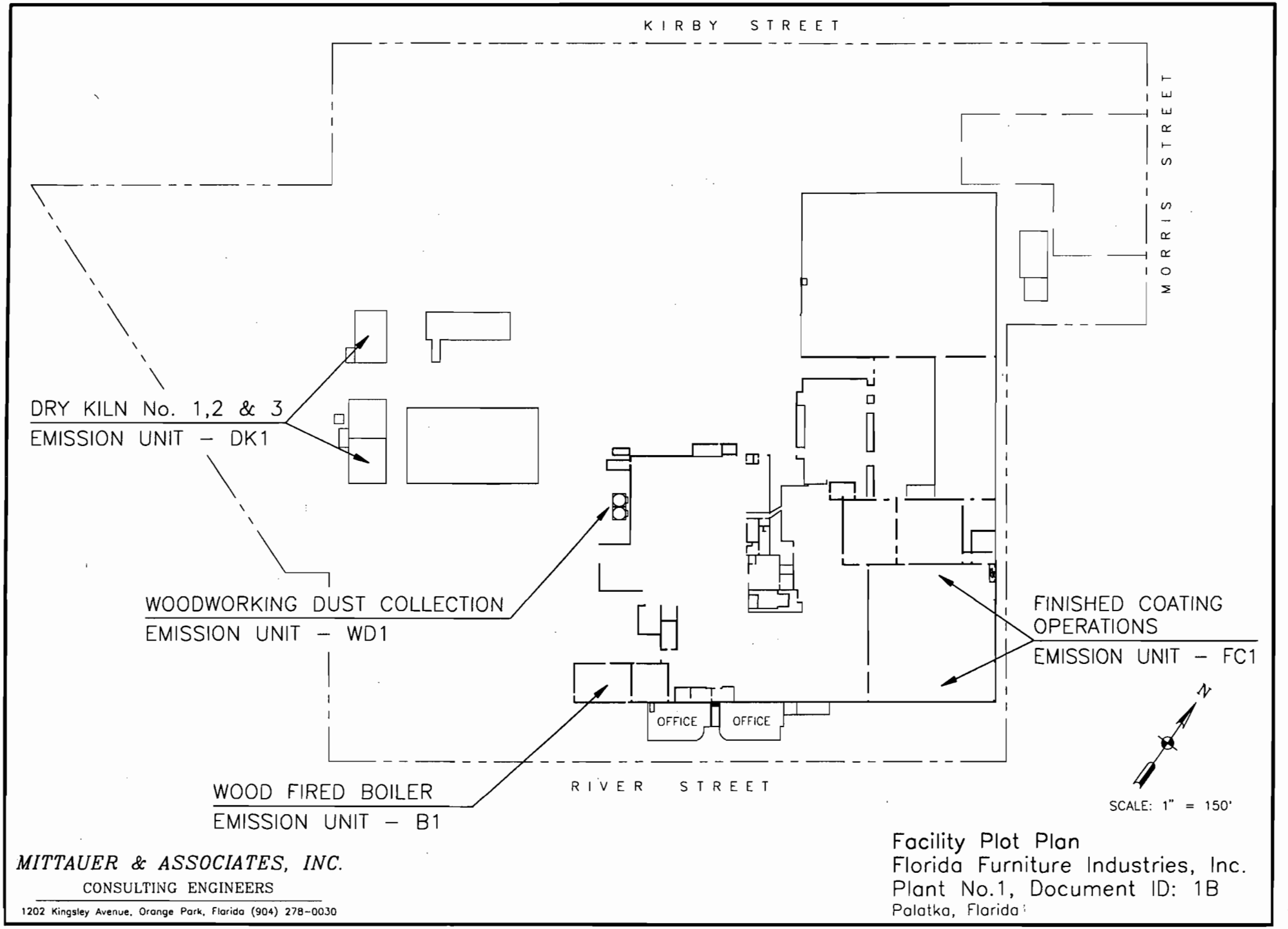
INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1990

MITTAUER & ASSOCIATES, INC.

CONSULTING ENGINEERS

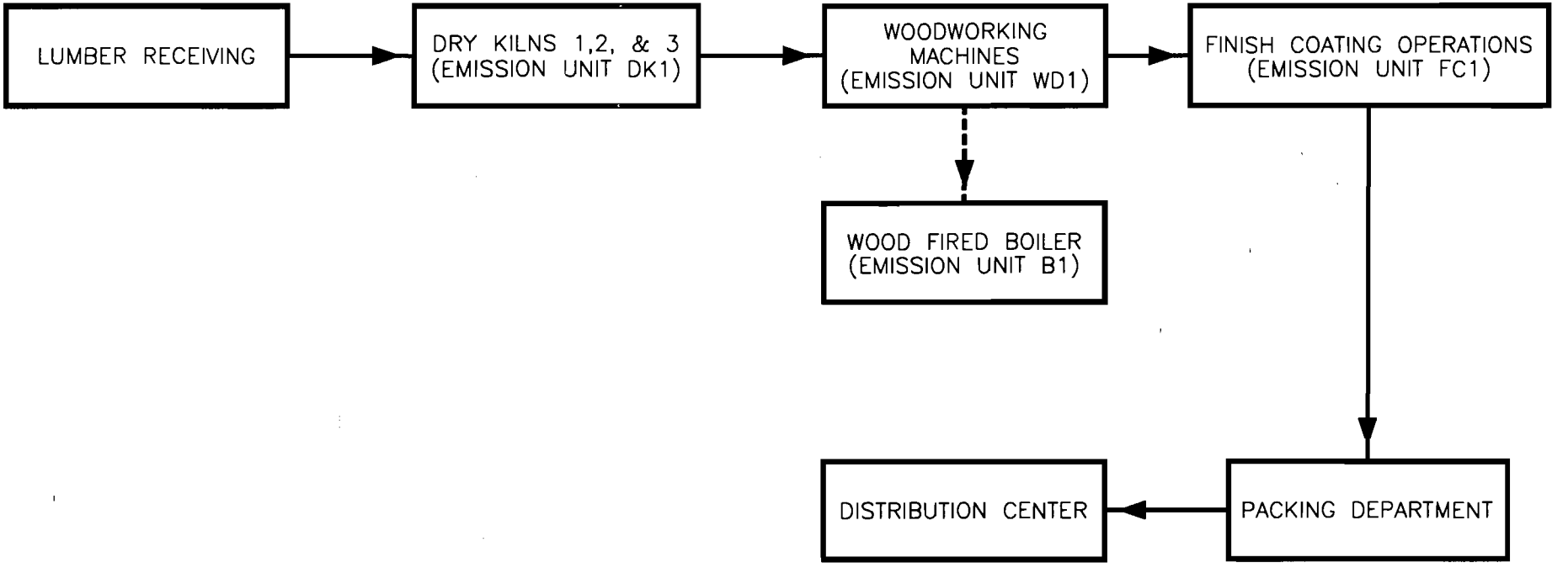
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

Facility Location Plan
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1A
Palatka, Florida



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

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



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

Facility Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1C
Palatka, Florida

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L 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. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[*X*] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

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

2. Single Process, Group of Processes, or Fugitive Only? Check one:

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

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

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

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): ***Dry Kilns located at Plant No. 1. Kilns Nos. 1-2-3.***		
2. Emissions Unit Identification Number: [*X*] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code: ***A***	4. Acid Rain Unit? [ ] Yes [*X*] No	5. Emissions Unit Major Group SIC Code: ***2511***
6. Emissions Unit Comment (limit to 500 characters): ***Dry Kilns are 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 1 and 2 are one building separated by a block wall.***		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): *N/A*
2. Control Device or Method Code: *N/A*

B.

1. Description (limit to 200 characters): *N/A*
2. Control Device or Method Code: *N/A*

C.

1. Description (limit to 200 characters): *N/A*
2. Control Device or Method Code: *N/A*

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date: ***Original Kilns - 1933. Rebuilt Dry Kilns 1 and 2 on 8/7/84.***	
2. Long-term Reserve Shutdown Date: *N/A*	
3. Package Unit: ***Dry Kilns 1 and 2 - Moore Dry Kilns.***	
Manufacturer: ***Dry Kiln 3 - Bold Designs***	Model Number: *N/A*
4. Generator Nameplate Rating: *N/A*	MW
5. Incinerator Information: *N/A*	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature: *N/A*	°F

Emissions Unit Operating Capacity

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: ***Kiln 1 - 85,000 bdf/4 days Kiln 2 - 65,000 bdf/4 days Kiln 3 - 100,000 bdf/4 days***		
4. Maximum Production Rate: *N/A*		
5. Operating Capacity Comment (limit to 200 characters): ***Kilns operate 24 hours per day, 7 days per week, and 52 weeks per year. Cycle time is approximately 4 days or 91 cycles per year. 1995 had approximately 50 cycles for each kiln, drying a total of 11,857,046 bdf of poplar lumber.***		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:	
24 hours/day	***7*** days/week
52 weeks/year	***8,760*** hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

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 Emissions 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.*
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62-4.210, F.A.C.: Construction Permits.	*62-210.900, F.A.C.: Forms and Instructions.*
62-4.220, F.A.C.: Operation Permit for New Sources.	*62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.*

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ***DK-1***	
2. Emission Point Type Code: [ ] 1 [ ] 2 [X] 3 [ ] 4	
3. Descriptions of Emissions 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: [ ] D [ ] F [ ] H [ ] P [X] R [ ] V [ ] W	
6. Stack Height: ***N/A***	feet
7. Exit Diameter: ***N/A***	feet
8. Exit Temperature: ***170°***	°F

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): ***N/A, Steam heat is generated by wood fired boiler - B1.***	
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 Percent Sulfur: *N/A*	8. Maximum Percent Ash: *N/A*
9. Million Btu per SCC Unit: *N/A*	
10. Segment Comment (limit to 200 characters): *N/A*	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated 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*

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: ***VOC***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***5.479*** lb/hour ***24.0*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***2.11 lb VOC / 1000 bdf***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters): ***Calculated***
   Plant uses Poplar hardwood
   All Kilns being used 91 cycles at full capacity 250,000 bdf.

   250,000 bdf x 91 = 22,750,000 bdf
   Emission factor 2.11#/1000 bdf

   $$2.11\#VOC/1.000\ bdf \times \frac{22{,}750{,}000\ bdf}{1{,}000} \div 2.000\#/ton$$

   = 24.0 tons/yr

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   N/A

Allowable Emissions (Pollutant identified on front of page)

A. *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. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

B. *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/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: *N/A*
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: *N/A*
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination *N/A*

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide? *N/A*

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	[ ] C	[ ] E	[ ] Unknown
SO2	[ ] C	[ ] E	[ ] Unknown
NO2	[ ] C	[ ] E	[ ] Unknown

4. Baseline Emissions:		
PM	lb/hour	tons/year
SO2	lb/hour	tons/year
NO2		tons/year

5. PSD Comment (limit to 200 characters):

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram [*X*] Attached, Document ID: *1D* [ ] 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 [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [*X*] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [*X*] Not Applicable
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [*X*] Not Applicable
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

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [*X*] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [*X*] Not Applicable

12. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [*X*] Not Applicable

13. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [*X*] Not Applicable

14. Acid Rain Application (Hard-copy Required)

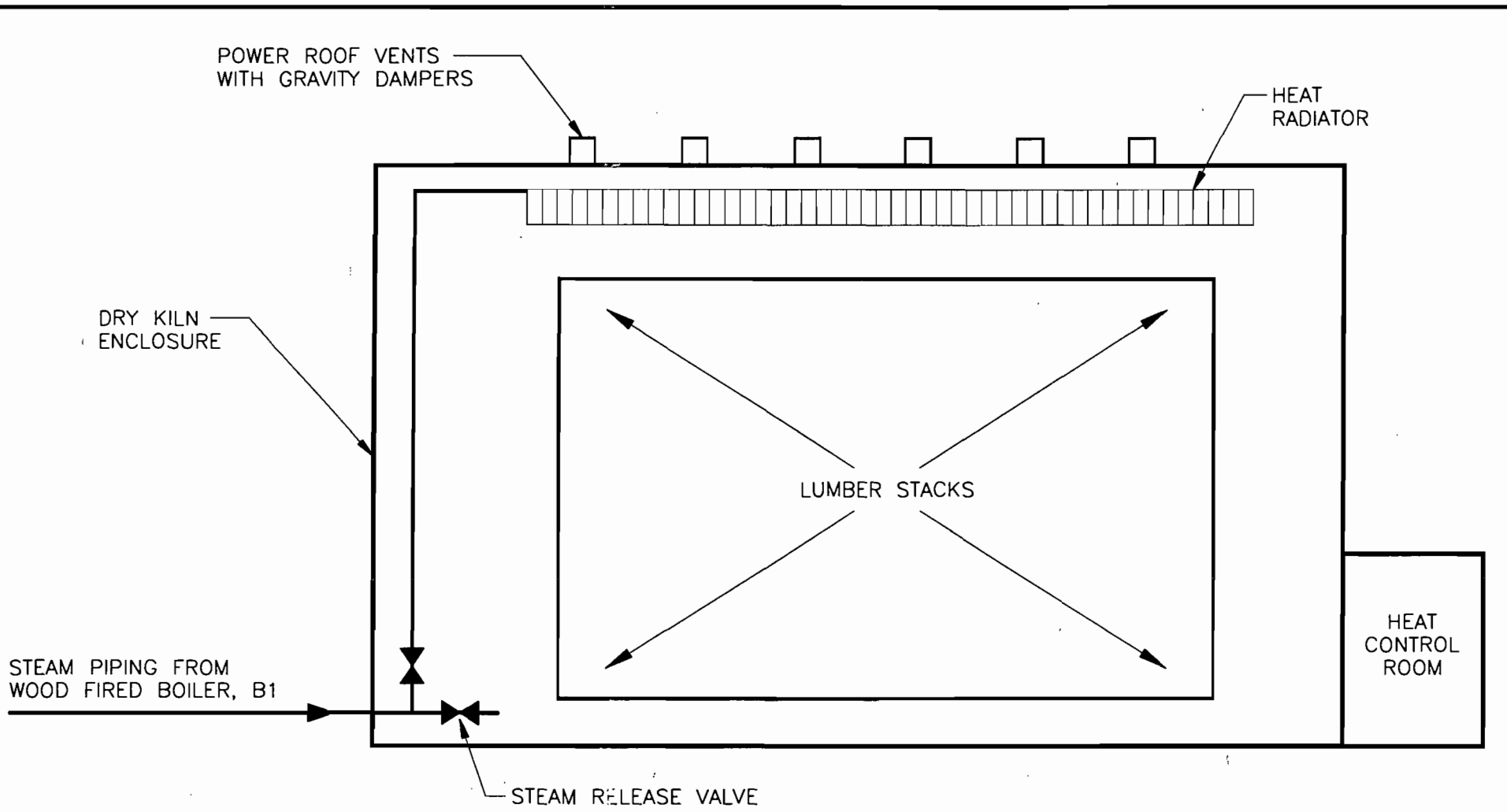
[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[*X*] Not Applicable



DRY KILN No. 1,2, & 3
EMISSION UNIT DK1

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

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

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L 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. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[*X*] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

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

2. Single Process, Group of Processes, or Fugitive Only? Check one:

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

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

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

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): ***Wood Dust Collection Unit consisting of 2 Bag Filter Units.***		
2. Emissions Unit Identification Number: [ ] No Corresponding ID [ ] Unknown ***G***		
3. Emissions Unit Status Code: ***A***	4. Acid Rain Unit? [ ] Yes [***X***] No	5. Emissions Unit Major Group SIC Code: ***2511***
6. Emissions Unit Comment (limit to 500 characters): ***Wood dust originates from the woodworking area. This dust is pneumatically conveyed under vacuum to the wood dust storage house via closed loop system. Air is filtered at Bag Filter Unit A & B prior to being discharged to the atmosphere.***		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): ***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. Singe 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: ***101***

B.

1. Description (limit to 200 characters): ***Bag Filter B*** ***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. Singe Polyester Felt Filter Bags, 99.96% efficient @ 3 microns*** ***Air to Cloth Ratio - 9.52:1*** ***Filtered Air - 67,035 CFM***
2. Control Device or Method Code: ***101***

C.

1. Description (limit to 200 characters): ***N/A***
2. Control Device or Method Code: ***N/A***

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date: ***1933, Bag Filters added July, 1989.***	
2. Long-term Reserve Shutdown Date: *N/A*	
3. Package Unit:	***Filter A - 13.5-456-12***
Manufacturer: ***Pneumafil Corporation***	Model Number: ***Filter B - 13.5-456-12***
4. Generator Nameplate Rating: *N/A* MW	
5. Incinerator Information: *N/A*	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature: *N/A*	°F

Emissions Unit Operating Capacity

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. Operating Capacity Comment (limit to 200 characters): ***Current throughput 3,740 lb/hr. + 40% additional capacity = 5,236 lb/hr. Per phone conversation with Chas Campbell of Clean Air Systems, Statesville, N.C. (704) 873-9998.***		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:	
24 hours/day	***7*** days/week
52 weeks/year	***8,760*** hours/year

D. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

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 Emissions 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.: Operation Permit for New Sources.	*62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.*

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. Continued.)

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.	
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) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.	
CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION 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)(c), F.A.C.: Unconfined Emissions of Particulate Matter	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ***WD-1***	
2. Emission Point Type Code: [ ] 1 [ ] 2 [*X*] 3 [ ] 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. ***Clean Air Discharge point located on Bag Filter Unit A.*** 2. ***Clean Air Discharge point located on Bag Filter Unit B.***	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: ***N/A***	
5. Discharge Type Code: [ ] D [ ] F [*X*] H [ ] P [ ] R [ ] V [ ] W	
6. Stack Height: ***N/A***	feet
7. Exit Diameter: ***N/A***	feet
8. Exit Temperature: ***Filter A - 77°*** ***Filter B - 77°***	°F

9. Actual Volumetric Flow Rate: ***N/A***	acfm
10. Percent Water Vapor : ***N/A***	%
11. Maximum Dry Standard Flow Rate: ***N/A***	dscfm
12. Nonstack Emission Point Height: ***Filter A - 50*** ***Filter 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***	

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (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 Percent Sulfur: *N/A*	8. Maximum Percent 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 and Associated Operating Method/Mode) (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 Percent Sulfur: *N/A*	8. Maximum Percent Ash: *N/A*
9. Million Btu per SCC Unit: *N/A*	
10. Segment Comment (limit to 200 characters): *N/A*	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM10	***101***	***0***	***EL***

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: ***PM/PM10***

2. Total Percent Efficiency of Control: ***99.96*** %

3. Potential Emissions: ***2.09*** lb/hour ***9.17*** tons/year

4. Synthetically Limited?
   [ ] Yes [*X*] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***0.04%***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [*X*] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):

   Process rate = 5236#/hr.
   Emission factor = 0.04%

   5,236#/hr x 0.04% = 2.09 lb/hr.

   2.09 lb/hr. x 8.760 hrs/yr ÷ 2000#/ton = 9.17 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   N/A

Allowable Emissions (Pollutant identified on front of page)

A. *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. Pollutant Allowable Emissions Comment (Description of Related Operating Method/ Mode) (limit to 200 characters):		

B. *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/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: ***VE20***
2. Basis for Allowable Opacity: [***X***] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: ***20*** % Exceptional Conditions: ***N/A***% Maximum Period of Excess Opacity Allowed: ***N/A*** min/hour
4. Method of Compliance: ***Testing of VE at minimum of 90% of operating rate.***
5. Visible Emissions Comment (limit to 200 characters):

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: ***N/A***
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [*X*] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide? *N/A*

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	[ ] C	[ ] E	[ ] Unknown
SO2	[ ] C	[ ] E	[ ] Unknown
NO2	[ ] C	[ ] E	[ ] Unknown

4. Baseline Emissions:		
PM	lb/hour	tons/year
SO2	lb/hour	tons/year
NO2		tons/year

5. PSD Comment (limit to 200 characters):

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram [*X*] Attached, Document ID: ***1E*** [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [*X*] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [*X*] Attached, Document ID: ***1F*** [ ] 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: ***1G*** [ ] Previously submitted, Date:_____ [ ] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [*X*] Not Applicable
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [*X*] Not Applicable
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

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [*X*] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [*X*] Not Applicable

12. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [*X*] Not Applicable

13. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [*X*] Not Applicable

14. Acid Rain Application (Hard-copy Required)

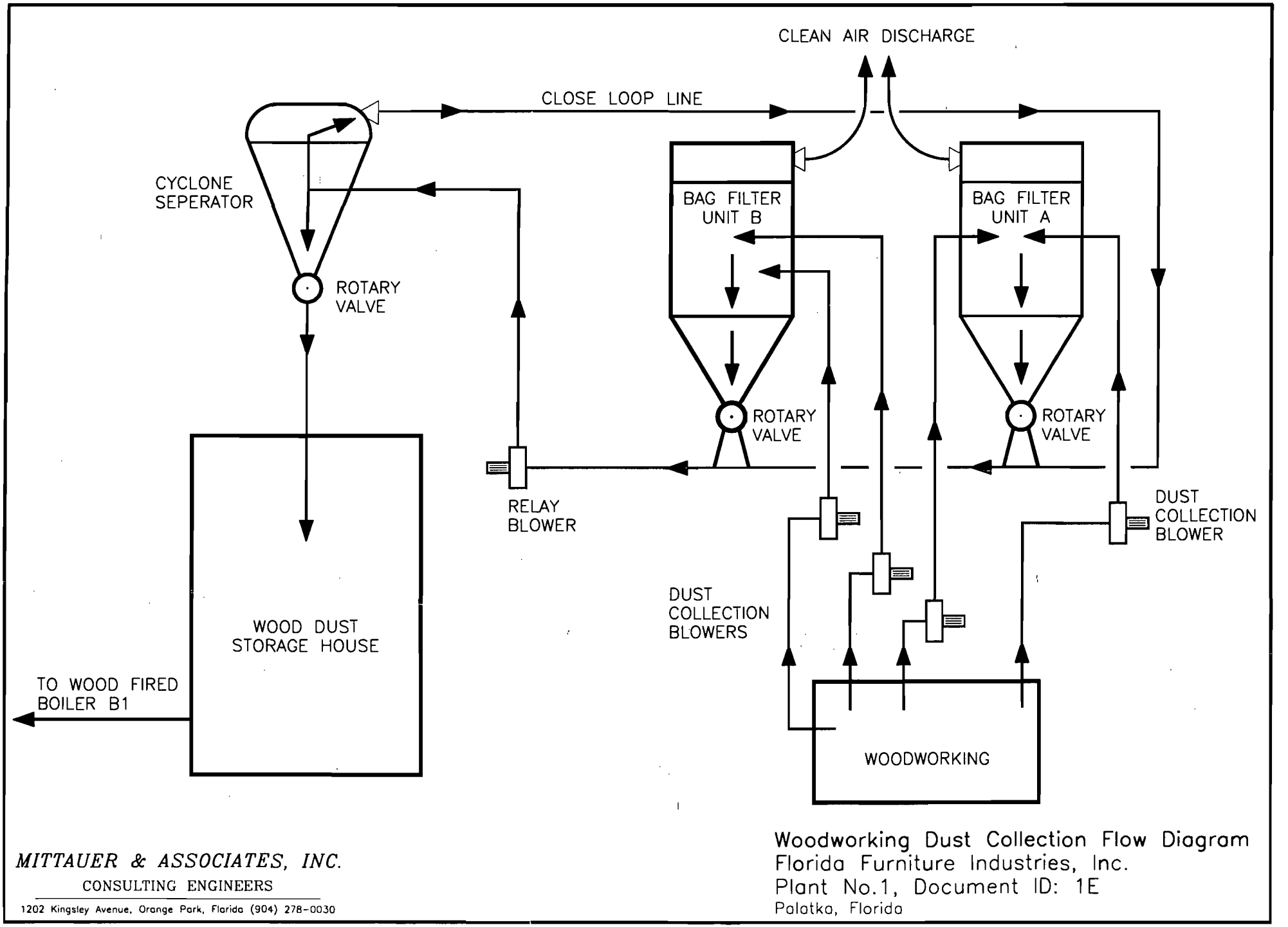
[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[*X*] Not Applicable



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

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

PNEUMAFIL CORPORATION

ENVIRONMENTAL SYSTEMS GROUP
P.O. Box 16348
Charlotte, NC 28297-8804
Phone (704) 399-7441 • Fax (704) 398-1533

To: Joe Mittauer
Mittauer & Associates

From: Roy Sweeney

Date: May 28, 1996

Pages: 1 (including cover page)

Re: Filter Efficiency of Pneumafil RAF Filters
Woodworking Dust Collection - WD-1
Florida Furniture Industries, Inc.

Dear Mr. Mittauer:

Based on the following general operating conditions, you can expect a filtration efficiency of 99.96% using 16 oz. polyester felt filters to Pneumafil's specifications (Part #A70444B3):

Inlet Loading: 5 grains/ACF
Inlet Partilce size: Greater than 5 micron
Air to Cloth ratio: Not to exceed 10:1

We hope this information satisfies your requirements.

Roy L. Sweeney
Roy L. Sweeney
Environmental Systems Group

Woodworking Dust Collection Control Equipment
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1F
Palatka, Florida

V.E. TEST

FILTER UNIT "A"
FILTER UNIT "B"

Woodworking Dust Collection Compliance Test Results
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1G
Palatka, Florida

MM/EMISSIONS

State of Florida
Visible Emissions Observation Form

COMPLIANCE STATUS: YES | NO | UNK

Source/Process Information

FACILITY NAME: Florida Furniture Industries

SOURCE NAME: #1 Baghouse South | PERMIT NO.: Filter Unit "A"

LOCATION/ADDRESS: River St PALATKA FL (Plant #1)

CONTACT: Ken Loyless | PHONE NO.: (904) 328-3444

PROCESS/PRODUCTION RATE:

CONTROL EQUIPMENT: | OPERATING MODE:

FUEL TYPE/RATE: | MATERIAL TYPE/RATE: Sawdust Woodchips | PERMITTED RATE:

DESCRIBE EMISSION POINT: 101 diameter

HEIGHT ABOVE GROUND LEVEL: ~~30~~ FT. 50' | HEIGHT RELATIVE TO OBSERVER: ~~25~~ 45 FT.

Emissions Description

DESCRIBE EMISSIONS: Clear

PLUME COLOR: Clear | PLUME TYPE: NONE

WATER DROPLETS PRESENT? YES ☐ NO ☒ | IF YES, IN PLUME? ATTACHED ☐ DETACHED ☐

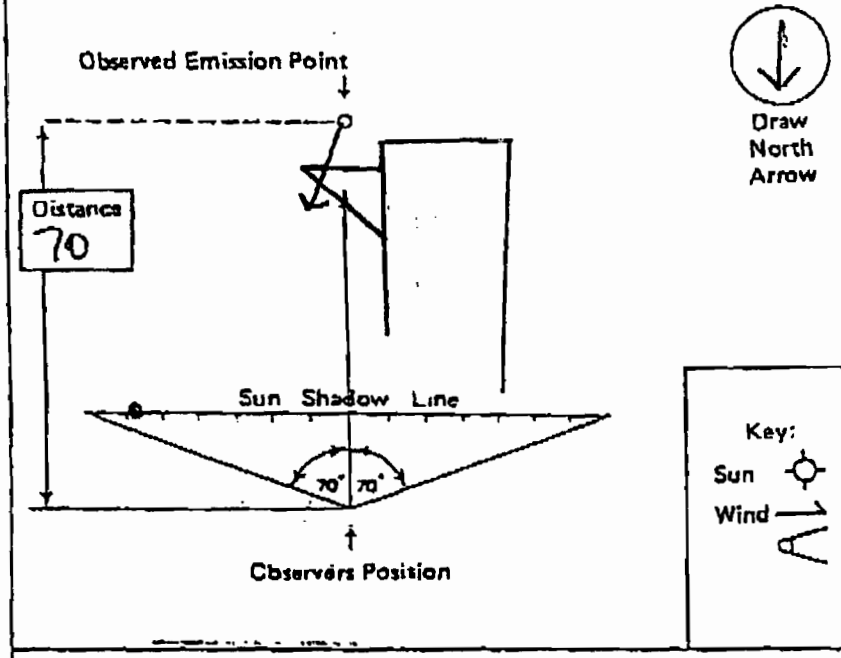
Meteorological Information

BACKGROUND: Sky | BACKGROUND COLOR: Blue

SKY CONDITIONS/% CLOUD COVER: clear | AMBIENT TEMP.: 78 °F

WIND SPEED: MPH | WIND DIRECTION:

Observation Data, Site Diagram



Opacity Readings

OBSERVATION DATE: 5-17-96 | START TIME: 0853 | STOP TIME: 0952

SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Compliance Information

RANGE OF OPACITY READINGS: MIN: 0 MAX: 0

AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS: 0

SHORT TERM AVERAGE DATA:

AVERAGING PERIOD _____ MINUTES ACTUAL AVERAGE _____ %

COMMENTS:

Certification Data, Signatures

OBSERVERS NAME: Dennie Peters

OBSERVERS SIGNATURE: Dennie Peters | DATE: 5-17-96

ORGANIZATION: Altach Environmental Services

CERTIFIED BY: E T A | DATE: 12-7-95

I HAVE RECEIVED A COPY OF THESE OBSERVATIONS | SIGNATURE: | DATE:

MM/EMISSIONS

State of Florida
Visible Emissions Observation Form

COMPLIANCE STATUS: YES NO N/A

Source/Process Information

FACILITY NAME: FL Furniture Industries
SOURCE NAME: #2 Baghouse (North) PERMIT NO.: Filter Unit "B"
LOCATION/ADDRESS: River St Palatka FL. (Plant #1)
CONTACT: Ken Layless PHONE NO.: (904) 328-3444
PROCESS/PRODUCTION RATE:
CONTROL EQUIPMENT: OPERATING MODE:
FUEL TYPE/RATE: MATERIAL TYPE/RATE: Sawdust/Woodchip PERMITTED RATE:
DESCRIBE EMISSION POINT: ~ 10' dia silo w/ 3K3 duct on side
HEIGHT ABOVE GROUND LEVEL: ~~40~~ 50' HEIGHT RELATIVE TO OBSERVER: ~~25~~ 45 ft.

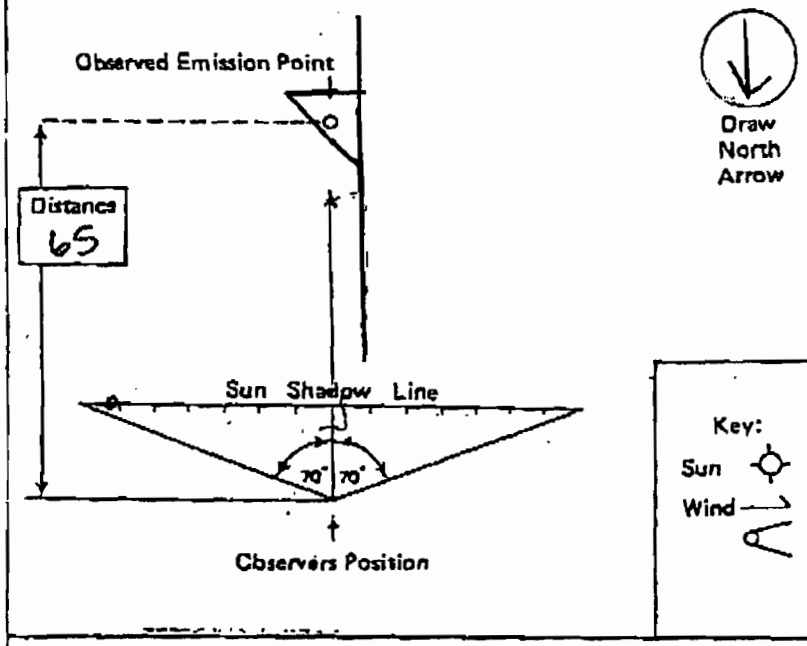
Emissions Description

DESCRIBE EMISSIONS: Clear
PLUME COLOR: Clear PLUME TYPE: NONE
WATER DROPLETS PRESENT? YES ☐ NO ☒ IF YES, IS PLUME: ATTACHED ☐ DETACHED ☐

Meteorological Information

BACKGROUND: Sky BACKGROUND COLOR: Blue
SKY CONDITIONS/% CLOUD COVER: Clear AMBIENT TEMP.: 78 °F
WIND SPEED: 0 MPH WIND DIRECTION: Ø

Observation Data, Site Diagram



Opacity Readings

OBSERVATION DATE: 5-17-96 START TIME: 0858 STOP TIME: 0952

SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
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2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

Compliance Information

RANGE OF OPACITY READINGS: MIN: 0 MAX: 0
AVERAGE OF HIGHEST 24 CONSECUTIVE READINGS: 0.
SHORT TERM AVERAGE DATA: AVERAGING PERIOD _____ MINUTES ACTUAL AVERAGE _____ %
COMMENTS: 1179

Certification Data, Signatures

OBSERVER'S NAME: Donnie Peters
OBSERVER'S SIGNATURE: Donnie Peters DATE: 5-17-96
ORGANIZATION: Astech Environmental Services
CERTIFIED BY: E.T.A DATE: 12-7-95
I HAVE RECEIVED A COPY OF THESE OBSERVATIONS SIGNATURE: DATE:

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L 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. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[*X*] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

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

2. Single Process, Group of Processes, or Fugitive Only? Check one:

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

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

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

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): ***Finish Coating Operations***		
2. Emissions Unit Identification Number: [*X*] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code: *A*	4. Acid Rain Unit? [ ] Yes [*X*] No	5. Emissions Unit Major Group SIC Code *2511*
6. Emissions Unit Comment (limit to 500 characters): ***Wood Parts are coated in spray booths using air, airless, air assisted, or HVLP Spray when possible. Also, print coating, dip coating and hand pad staining takes place. Finished product is dried in steam heated ovens in the Finishing Room.***		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): ***Paper mesh with polyester backing filter on spray booths with 98.5 - 99.5% efficiency.***
2. Control Device or Method Code: ***101***

B.

1. Description (limit to 200 characters):
Waterborne coatings being used in stain, print coating, dip coating and spray coating where possible.
2. Control Device or Method Code: ***104***

C.

1. Description (limit to 200 characters):
N/A
2. Control Device or Method Code: *N/A*

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date: ***1974***	
2. Long-term Reserve Shutdown Date: ***N/A***	
3. Package Unit: Manufacturer: ***Deburgh Finishing System***	Model Number: ***2***
4. Generator Nameplate Rating: ***N/A***	MW
5. Incinerator Information: ***N/A*** Dwell Temperature: Dwell Time: Incinerator Afterburner Temperature: ***N/A***	°F seconds °F

Emissions Unit Operating Capacity

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: ***1,020,014 units per year.***		
4. Maximum Production Rate: ***N/A***		
5. Operating Capacity Comment (limit to 200 characters): ***Unit operates as a Finish Coating Production Line producing furniture parts and completed units at the rate of 116.44 units/hr (237,774 units ÷ 2,042 hrs. operated 1995) (116.44 units per hour x 8,760 = 1,020,014 units per year.***		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:	
24 hours/day	***7*** days/week
52 weeks/year	***8,760*** hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

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 Emissions 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.: Operation Permit for New Sources.	*62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.*

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. Continued.)

62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.	
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) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.	
CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION 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)(c), F.A.C.: Unconfined Emissions of Particulate Matter	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ***FC1***
2. Emission Point Type Code: [ ] 1 [ ] 2 [X] 3 [X] 4
3. Descriptions of Emissions 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: [ ] D [X] F [ ] H [ ] P [ ] R [X] V [X] W
6. Stack Height: ***Spray Booths - 25 ft. Drying Ovens - 26 ft.*** feet
7. Exit Diameter: ***Spray Booths - 36 in. Drying Ovens - 18 in.*** feet
8. Exit Temperature: ***Spray Booths - 77°. Drying Ovens - No. 1 - 115°*** °F ***No. 2 - 125°***

9. Actual Volumetric Flow Rate: ***See Field 14 (Design Rate)***	acfm
10. Percent Water Vapor : ***N/A***	%
11. Maximum Dry Standard Flow Rate: ***N/A***	dscfm
12. Nonstack Emission Point Height: ***Fugitive Sources (printing, dip coating, pad staining)*** ***4***	feet
13. Emission Point UTM Coordinates: Zone: ***17*** East (km): ***438.3*** North (km): ***3278.9***	
14. Emission Point Comment (limit to 200 characters): ***Spray Booth No. 1 - 21,000 cfm*** ***Spray Booth No. 2 - 36,000 cfm*** ***Spray Booth No. 3 - 21,000 cfm*** ***Spray Booth No. 4 - 21,000 cfm*** ***Spray Booth No. 5 - 21,000 cfm*** ***Spray Booth No. 6 - 21,000 cfm*** ***Oven No. 1 - 3,000 cfm*** ***Oven No. 2 - 1,900 cfm***	

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): ***N/A, Steam heat is generated by wood fired boiler - B1.***	
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 Percent Sulfur: ***N/A***	8. Maximum Percent 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 and Associated Operating Method/Mode) (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 Percent Sulfur: *N/A*	8. Maximum Percent Ash: *N/A*
9. Million Btu per SCC Unit: *N/A*	
10. Segment Comment (limit to 200 characters): *N/A*	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated 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*
H046	*N/A*	*N/A*	*NS*
H047	*N/A*	*N/A*	*NS*
H053	*N/A*	*N/A*	*NS*
H060	*N/A*	*N/A*	*NS*
H066	*N/A*	*N/A*	*NS*
H085	*N/A*	*N/A*	*NS*
H095	*N/A*	*N/A*	*NS*
H096	*N/A*	*N/A*	*NS*
H113	*N/A*	*N/A*	*NS*
H115	*N/A*	*N/A*	*NS*
H120	*N/A*	*N/A*	*NS*
H123	*N/A*	*N/A*	*NS*
H132	*N/A*	*N/A*	*NS*
H169	*N/A*	*N/A*	*NS*
H182	*N/A*	*N/A*	*NS*
H186	*N/A*	*N/A*	*NS*

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: ***VOC***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***467.53*** lb/hour ***2,048*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 954,687.69 lbs.
   954,687.69 ÷ 2042 hrs/1995 = 467.52 lb/hr 1995

   Potential Emission: 467.52 lb/hr x 8760 hr = 4,095,526 lb/yr
   4,095,526 lb ÷ 8760 hr = 467.53 lb/hr
   4,095,526 lb ÷ 2000 lb/ton = 2,048 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   VOC emission rates include pollutants which are listed both VOC and HAP.

Emissions Unit Information Section ***3*** **of** ***4***

Pollutant Detail Information:

1. Pollutant Emitted: ***HO46***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.0163*** lb/hour ***0.0714*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 33.31 lbs./yr
   33.31 ÷ 2042 hrs/1995 = 00.0163 lb/hr 1995

   Potential Emission: 0.0163 lb/hr x 8760 hr = 142.90 lb/yr
   142.90 lb ÷ 8760 hr = 0.0163 lb/hr
   142.90 lb ÷ 2000 lb/ton = 0.0714 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Chromium compounds.

Pollutant Detail Information:

1. Pollutant Emitted: ***H047***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.00024*** lb/hour ***0.0011*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 0.49 lbs./yr
   0.49 ÷ 2042 hrs/1995 = 0.00024 lb/hr 1995

   Potential Emission: 0.00024 lb/hr x 8760 hr = 2.10 lb/yr
   2.10 lb ÷ 8760 hr = 0.00024 lb/hr
   2.10 lb ÷ 2000 lb/ton = 0.0011 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Cobalt compounds.

Emissions Unit Information Section ***3*** **of** ***4***

Pollutant Detail Information:

1. Pollutant Emitted: ***H053***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.0042*** lb/hour ***0.0185*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 8.64 lbs/yr.
   8.64 ÷ 2042 hrs/1995 = 0.0042 lb/hr 1995

   Potential Emission: 0.0042 lb/hr x 8760 hr = 37.06 lb/yr
   37.06 lb ÷ 8760 hr = 0.0042 lb/hr
   37.06 lb ÷ 2000 lb/ton = -.0185 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Cumene - Included in VOC total..

Pollutant Detail Information:

1. Pollutant Emitted: ***H060***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.0048*** lb/hour ***0.0212*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 9.90 lbs./yr
   9.90 ÷ 2042 hrs/1995 = 0.0048 lb/hr 1995

   Potential Emission: 0.0048 lb/hr x 8760 hr = 42.47 lb/yr
   42.47 lb ÷ 8760 hr = 0.0048 lb/hr
   42.47 lb ÷ 2000 lb/ton = 0.0212 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Dibutylphthalate

Pollutant Detail Information:

1. Pollutant Emitted: ***H066***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.00078*** lb/hour ***0.0034*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 1.60 lbs./yr
   1.60 ÷ 2042 hrs/1995 = 0.00078 lb/hr 1995

   Potential Emission: 0.00078 lb/hr x 8760 hr = 6.86 lb/yr
   6.86 lb ÷ 8760 hr = 0.00078 lb/hr
   6.86 lb ÷ 2000 lb/ton = 0.0034 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Diethanolamine.

Pollutant Detail Information:

1. Pollutant Emitted: ***H085***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***17.103*** lb/hour ***74.91*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 34,924.69 lbs./
   34,924.69 ÷ 2042 hrs/1995 = 17.103 lb/hr 1995

   Potential Emission: 17.103 lb/hr x 8760 hr = 149,824 lb/yr
   149,824 lb ÷ 8760 hr = 17.103 lb/hr
   149,824 lb ÷ 2000 lb/ton = 74.91 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Ethyle benzene - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H095***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.0146*** lb/hour ***0.0637*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 29.72 lbs.
   29.72 ÷ 2042 hrs/1995 = 0.0146 lb/hr 1995

   Potential Emission: 0.0146 lb/hr x 8760 hr = 127.50 lb/yr
   127.50 lb ÷ 8760 hr = 0.0146 lb/hr
   127.50 lb ÷ 2000 lb/ton = 0.0637 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Formaldehyde - Included in VOC total.

Emissions Unit Information Section *3* **of** *4*

Pollutant Detail Information:

1. Pollutant Emitted: ***H096***

2. Total Percent Efficiency of Control: *N/A* %

3. Potential Emissions: ***9.8026*** lb/hour ***42.935*** tons/year

4. Synthetically Limited?
   [ ] Yes [*X*] No

5. Range of Estimated Fugitive/Other Emissions: *N/A*
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [*X*] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 20,017.026 lbs.
   20,017.026 ÷ 2042 hrs/1995 = 9.8026 lb/hr 1995

   Potential Emission: 9.8026 lb/hr x 8760 hr = 85,871 lb/yr
   85,871 lb ÷ 8760 hr = 9.8026 lb/hr
   85,871 lb ÷ 2000 lb/ton = 42.935 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Glycol ethers - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H113***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.1204*** lb/hour ***0.5275*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 245.93 lbs.
   245.93 ÷ 2042 hrs/1995 = 0.1204 lb/hr 1995

   Potential Emission: 0.1204 lb/hr x 8760 hr = 1,055 lb/yr
   1,055 lb ÷ 8760 hr = 0.1204 lb/hr
   1,055 lb ÷ 2000 lb/ton = 0.5275 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Manganese Compounds.

Pollutant Detail Information:

1. Pollutant Emitted: ***H115***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***10.69*** lb/hour ***46.83*** tons/year

4. Synthetically Limited?
   [ ] Yes [*X*] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [*X*] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 21,834.42 lbs.
   21,834.42 ÷ 2042 hrs/1995 = 10.69 lb/hr 1995

   Potential Emission: 10.69 lb/hr x 8760 hr = 93,668 lb/yr
   93,668 lb ÷ 8760 hr = 10.69 lb/hr
   93,668 lb ÷ 2000 lb/ton = 46.83 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Methanol - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H120***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***1.834*** lb/hour ***8.033*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 3,745.29 lbs.
   3,745.29 ÷ 2042 hrs/1995 = 1.834 lb/hr 1995

   Potential Emission: 1.834 lb/hr x 8760 hr = 16,067 lb/yr
   16,067 lb ÷ 8760 hr = 1.834 lb/hr
   16,067 lb ÷ 2000 lb/ton = 8.033 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Methylethyl ketone - Included in VOC total. .

Pollutant Detail Information:

1. Pollutant Emitted: ***H123***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.8079*** lb/hour ***3.539*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 1,649.74 lbs.
   1,649.74 ÷ 2042 hrs/1995 = 0.8079 lb/hr 1995

   Potential Emission: 0.8079 lb/hr x 8760 hr = 7,077 lb/yr
   7,077 lb ÷ 8760 hr = 0.8079 lb/hr
   7,077 lb ÷ 2000 lb/ton = 3.539 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Methyl isobutyl ketone - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H132***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.0495*** lb/hour ***0.2167*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 101.01 lbs.
   101.01 ÷ 2042 hrs/1995 = 0.0495 lb/hr 1995

   Potential Emission: 0.0495 lb/hr x 8760 hr = 433.32 lb/yr
   433.32 lb ÷ 8760 hr = 0.0495 lb/hr
   433.32 lb ÷ 2000 lb/ton = 0.2167 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Naphthalene - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H169***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***121.147*** lb/hour ***530.62*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 247,382.05 lbs.
   247,382.05 ÷ 2042 hrs/1995 = 121.147 lb/hr 1995

   Potential Emission: 121.147 lb/hr x 8760 hr = 1,061,247 lb/yr
   1,061,247 lb ÷ 8760 hr = 121.147 lb/hr
   1,061,247 lb ÷ 2000 lb/ton = 530.62 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Toluene - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H182***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***0.00065*** lb/hour ***0.0029*** tons/year

4. Synthetically Limited?
   [ ] Yes [*X*] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [*X*] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 1.33 lbs.
   1.33 ÷ 2042 hrs/1995 = 0.00065 lb/hr 1995

   Potential Emission: 0.00065 lb/hr x 8760 hr = 5.706 lb/yr
   5.706 lb ÷ 8760 hr = 0.00065 lb/hr
   5.706 lb ÷ 2000 lb/ton = 0.0029 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Vinyl acetate - Included in VOC total.

Pollutant Detail Information:

1. Pollutant Emitted: ***H186***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***72.81*** lb/hour ***318.914*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***100% Emitted***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [***X***] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   Unit operated 2042 hours in 1995
   1995 Emissions 148,681.14 lbs.
   148,681.14 ÷ 2042 hrs/1995 = 72.81 lb/hr 1995

   Potential Emission: 72.81 lb/hr x 8760 hr = 637,829 lb/yr
   637,829 lb ÷ 8760 hr = 72.81 lb/hr
   637,829 lb ÷ 2000 lb/ton = 318.914 tons/yr.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   Xylenes - Included in VOC total.

Allowable Emissions (Pollutant identified on front of page)

A. *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. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

B. *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/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: ***N/A***
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: ***N/A***
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination *N/A*

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide? *N/A*

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	[ ] C	[ ] E	[ ] Unknown
SO2	[ ] C	[ ] E	[ ] Unknown
NO2	[ ] C	[ ] E	[ ] Unknown

4. Baseline Emissions:		
PM	lb/hour	tons/year
SO2	lb/hour	tons/year
NO2		tons/year

5. PSD Comment (limit to 200 characters):

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram [*X*] Attached, Document ID: *1H* [ ] 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 [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [*X*] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [*X*] Not Applicable
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [*X*] Not Applicable
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

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [*X*] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [*X*] Not Applicable

12. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [*X*] Not Applicable

13. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [*X*] Not Applicable

14. Acid Rain Application (Hard-copy Required)

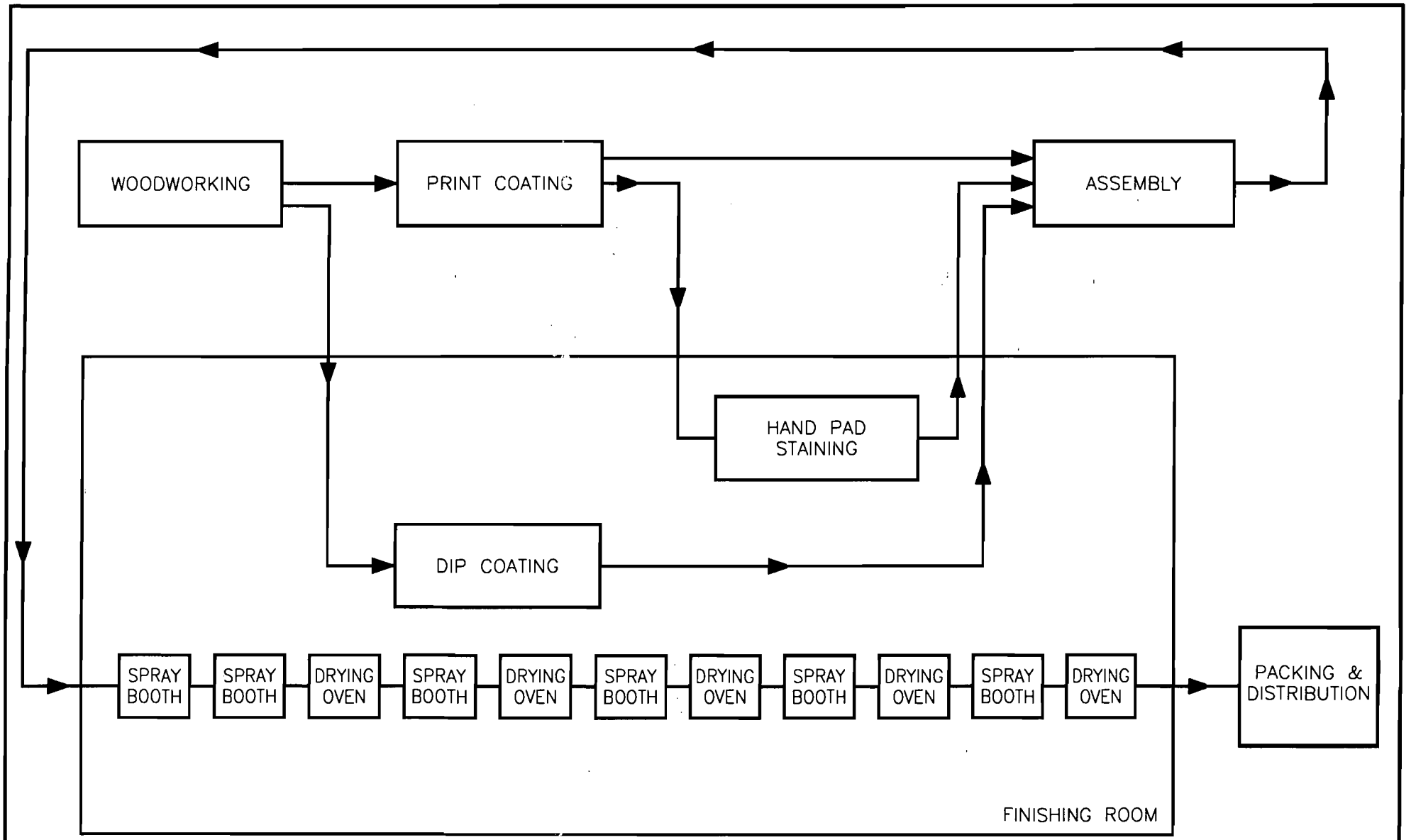
[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[*X*] Not Applicable



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

Finish Coating Operations Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1H
Palatka, Florida

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L 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. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[*X*] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

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

2. Single Process, Group of Processes, or Fugitive Only? Check one:

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

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

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

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. 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 - WD1.***		
2. Emissions Unit Identification Number: [ ] No Corresponding ID [ ] Unknown ***A***		
3. Emissions Unit Status Code: ***A***	4. Acid Rain Unit? [ ] Yes [***X***] No	5. Emissions Unit Major Group SIC Code: ***2511***
6. Emissions Unit Comment (limit to 500 characters): ***Boiler provides steam to plant for heating of dry kilns, drying ovens in finish coating operations and for heating of the manufacturing facility.***		

Emissions Unit Control Equipment

A.

1. Description (limit to 200 characters): ***Wood burning boiler fed by wood chips and sawdust with multi-cyclone fly ash arrestor and fly ash re-injection system.***
2. Control Device or Method Code: ***077***

B.

1. Description (limit to 200 characters): *N/A*
2. Control Device or Method Code: *N/A*

C.

1. Description (limit to 200 characters): *N/A*
2. Control Device or Method Code: *N/A*

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date: ***1933, Replaced in 1963.***	
2. Long-term Reserve Shutdown Date: ***N/A***	
3. Package Unit: Manufacturer: ***The Bigelow Company*** Model Number: ***HRT***	
4. Generator Nameplate Rating: ***N/A*** MW	
5. Incinerator Information: ***N/A***	
Dwell Temperature:	***N/A*** °F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

Emissions Unit Operating Capacity

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 lbs/hr*** ***23.52 tons/day***		
4. Maximum Production Rate: ***N/A***		
5. Operating Capacity Comment (limit to 200 characters): ***Throughput is based on current permitted rate.***		

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:	
24 hours/day	***7*** days/week
52 weeks/year	***8,760*** hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

N/A

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	*62-4.220, F.A.C.: Operation Permit for New Sources.*
40 CFR 82: Protection of Stratospheric Ozone	*CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95*
40 CFR 82, Subpart F: Recycling and Emissions 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.*
62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.	*62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.*

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. Continued.)

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) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.	
CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION 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)(c), F.A.C.: Unconfined Emissions of Particulate Matter	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: ***B-1***	
2. Emission Point Type Code: [*X*] 1 [ ] 2 [ ] 3 [ ] 4	
3. Descriptions of Emissions 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: [ ] D [ ] F [ ] H [ ] P [ ] R [*X*] V [ ] W	
6. Stack Height: ***50***	feet
7. Exit Diameter: ***3.2***	feet
8. Exit Temperature: ***491°***	°F

9. Actual Volumetric Flow Rate: ***6600***	acfm
10. Percent 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***	

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

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

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (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 Percent Sulfur: ***0***	8. Maximum Percent Ash: ***1.2%***
9. Million Btu per SCC Unit: ***18.61 MMBTU/ton***	
10. Segment Comment (limit to 200 characters): ***N/A***	

Emissions Unit Information Section ***4*** **of** ***4***

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

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (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 Percent Sulfur: ***N/A***	8. Maximum Percent Ash: ***N/A***
9. Million Btu per SCC Unit: ***N/A***	
10. Segment Comment (limit to 200 characters): ***N/A***	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

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

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: ***CO***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***13.33*** lb/hour ***58.38*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***13.6 lb / ton***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [ ] 2 [***X***] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):

   $$\frac{13.6 \text{ lbs/ton} \times 8{,}585.00 \text{ tons/yr}}{2{,}000 \text{ lbs/ton}} = 58.38 \text{ tons/yr} = 13.33 \text{ lbs/hr}$$

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   N/A

Pollutant Detail Information:

1. Pollutant Emitted: ***NOX***

2. Total Percent Efficiency of Control: ***N/A*** %

3. Potential Emissions: ***1.47*** lb/hour ***6.44*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***1.5 lb/ton***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [ ] 2 [***X***] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):

$$\frac{1.5 \text{ lbs/ton} \times 8{,}585.00 \text{ tons/yr}}{2{,}000 \text{ lbs/ton}} = 6.44 \text{ tons/yr} = 1.47 \text{ lb/hr}$$

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   N/A

Pollutant Detail Information:

1. Pollutant Emitted: ***PM***

2. Total Percent Efficiency of Control: ***90%*** %

3. Potential Emissions: ***0.86*** lb/hour ***3.78*** tons/year

4. Synthetically Limited?
   [ ] Yes [***X***] No

5. Range of Estimated Fugitive/Other Emissions: ***N/A***
   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor:
   Reference: ***8.8 lb/ton***

7. Emissions Method Code:
   [ ] 0 [ ] 1 [ ] 2 [***X***] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):
   $\frac{8.8 \text{ lbs/ton} \times 8{,}585.00 \text{ tons/yr} \times 10\%}{2{,}000 \text{ lbs/ton}}$ = ***3.78 tons/yr = 0.86 lbs/hr***

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
   N/A

Allowable Emissions (Pollutant identified on front of page)

A. ***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. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

B. ***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/hr	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

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

1. Visible Emissions Subtype: ***VE20***
2. Basis for Allowable Opacity: [***X***] Rule [ ] 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. Annual VE Test. Any malfunction immediately reported.***
5. Visible Emissions Comment (limit to 200 characters): ***N/A***

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: ***N/A***
2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4. Method of Compliance:
5. Visible Emissions Comment (limit to 200 characters):

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

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

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [ ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

   [*X*] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide? *N/A*

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[ ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	[ ] C	[ ] E	[ ] Unknown
SO2	[ ] C	[ ] E	[ ] Unknown
NO2	[ ] C	[ ] E	[ ] Unknown
4. Baseline Emissions:			
PM		lb/hour	tons/year
SO2		lb/hour	tons/year
NO2			tons/year
5. PSD Comment (limit to 200 characters):			

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1. Process Flow Diagram
   [*X*] Attached, Document ID: ***1I*** [ ] 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: ***1J***

   [ ] Previously submitted, Date:_____

   [ ] Not Applicable

6. Procedures for Startup and Shutdown
   [ ] Attached, Document ID:_____ [*X*] Not Applicable

7. Operation and Maintenance Plan
   [ ] Attached, Document ID:_____ [*X*] Not Applicable

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

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [*X*] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [*X*] Not Applicable

12. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [*X*] Not Applicable

13. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [*X*] Not Applicable

14. Acid Rain Application (Hard-copy Required)

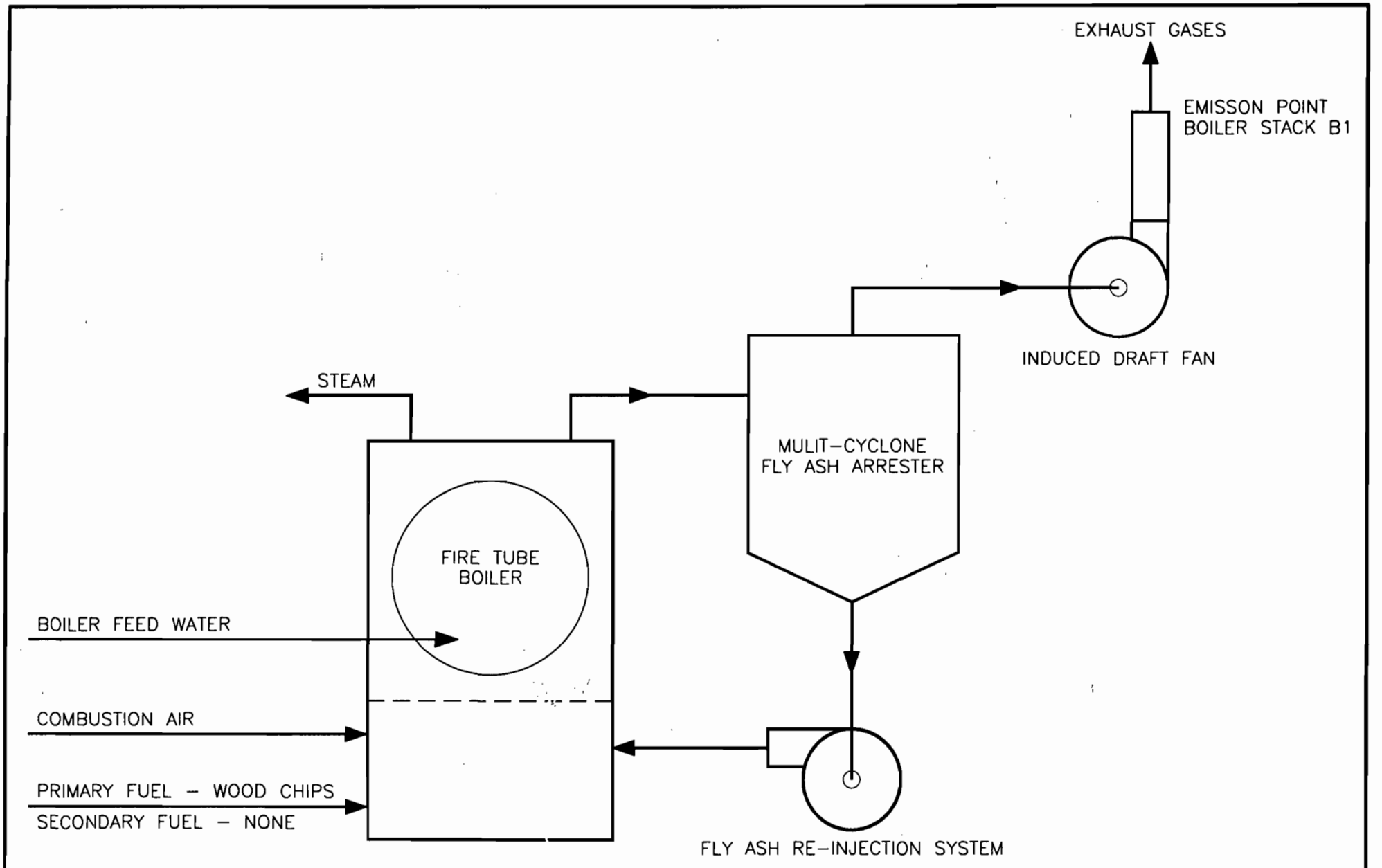
[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[*X*] Not Applicable



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue, Orange Park, Florida (904) 278-0030

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

Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

March 1, 1996

Mr. Kenneth G. Loyless Safety Director
Florida Furniture Industries
P.O. Box 610
Palatka, Florida 32178-0610

Dear Mr. Loyless:

Putnam County AP
Florida Furniture
Industries
Wood Boilers
A054-205266,195322/
31JAX54000201,2601

I.Status

a. The following test(s)

[XX] has/have been reviewed

[ ] is/are being reviewed

Opacity 02/08/96

The results of the test(s) review indicate:

[XX] compliance

[ ] noncompliance

[ ] further information required

II. Explanation:

Sincerely,

Morton Benjamin
Compliance Engineer

Wood Fired Boiler Compliance Test Results
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1J
Palatka, Florida

Plant 1

VISIBLE EMISSION OBSERVATION FORM

SOURCE NAME	Florida Furniture CO.
ADDRESS	722 River ST.
	Ken Loyless
CITY	PALATKA
STATE	FL.
ZIP	32177
PHONE	(904) 328-3444
SOURCE ID NUMBER	

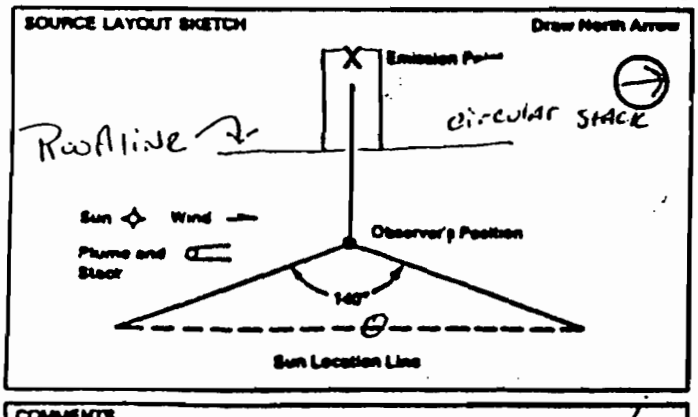
PROCESS EQUIPMENT	Boiler Stack
OPERATING MODE	
CONTROL EQUIPMENT	
OPERATING MODE	

DESCRIBE EMISSION POINT START	~24" dir. Silver Stack STOP ✓
HEIGHT ABOVE GROUND LEVEL START	~60' STOP ✓
HEIGHT RELATIVE TO OBSERVER START	55' STOP ✓
DISTANCE FROM OBSERVER START	100' STOP ✓
DIRECTION FROM OBSERVER START	West STOP ✓

DESCRIBE EMISSIONS START	Coning STOP ✓
EMISSION COLOR START	White STOP ✓
PLUME TYPE	CONTINUOUS X FUGITIVE ☐ INTERMITTENT ☐
WATER DROPLETS PRESENT	NO X YES ☐
IS WATER DROPLET PLUME	ATTACHED ☐ DETACHED X
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START	Stack outlet STOP ✓

DESCRIBE BACKGROUND START	Sky STOP ✓	
BACKGROUND COLOR START	Blue STOP ✓	SKY CONDITIONS START Clear STOP ✓
WIND SPEED START	0 STOP ✓	WIND DIRECTION START N/A STOP ✓
AMBIENT TEMP START	STOP	WET BULB TEMP / RH, percent

SOURCE LAYOUT SKETCH — Draw North Arrow



OBSERVATION DATE	START TIME	STOP TIME
Feb 8, 1996	0909	1008

SEC / MIN	0	15	30	45	SEC / MIN	0	15	30	45
1	5	5	5	5	31	5	5	10	10
2	5	5	5	5	32	10	5	5	5
3	5	5	5	5	33	5	5	5	5
4	5	5	5	5	34	5	5	5	5
5	5	5	5	5	35	5	5	5	5
6	5	5	5	5	36	5	5	5	5
7	5	5	5	5	37	5	5	5	5
8	5	5	5	5	38	5	5	5	5
9	5	5	5	5	39	5	5	5	5
10	5	5	5	5	40	5	5	5	5
11	5	5	5	5	41	5	10	10	10
12	5	5	5	5	42	10	10	5	10
13	5	5	5	5	43	10	10	10	15
14	5	5	5	5	44	10	10	10	5
15	5	5	5	5	45	5	5	5	5
16	5	5	5	5	46	5	5	5	5
17	5	5	5	5	47	5	5	5	5
18	5	5	5	5	48	5	5	5	5
19	5	5	5	5	49	5	5	5	5
20	5	5	5	5	50	5	10	5	5
21	5	5	5	5	51	5	5	5	5
22	5	5	5	5	52	5	5	5	5
23	5	5	5	5	53	5	5	5	5
24	5	5	5	5	54	5	5	5	5
25	5	5	5	5	55	5	5	5	5
26	5	5	5	5	56	5	5	5	5
27	5	5	5	5	57	5	5	5	5
28	5	5	5	5	58	5	5	5	5
29	5	5	5	5	59	5	5	5	5
30	5	5	5	5	60	5	5	5	5

Highest 6 min. readings.

AVERAGE OPACITY FOR HIGHEST PERIOD	7.92%
NUMBER OF READINGS ABOVE 20 % WERE	0
RANGE OF OPACITY READINGS MINIMUM	5
MAXIMUM	15

COMMENTS	Done Simultaneously w/ Dust Collector

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE	
TITLE	DATE

OBSERVER'S NAME (PRINT)	Donnie PETERS
OBSERVER'S SIGNATURE	Donnie Peters
DATE	2-8-96
ORGANIZATION	Astech Environmental Services
CERTIFIED BY	E.T.A.
DATE	12-7-95
VERIFIED BY	
DATE	

F 1020

VISIBLE EMISSIONS EVALUATOR

This [illegible] that

(Dona[illegible]eters)

met the specifications of Fed[illegible] 9 and qualified as a visible emissions evaluator. Maxim[illegible] black smoke did not exceed 7.5% opacity and no singl[illegible]r ex[illegible]city was incurred during the certification test conduc[illegible] East[illegible]ociates of Raleigh, North Carolina. This certificat[illegible] of issue.

[signature] — Preside[illegible]

251391 — [illegible]ertificate Number

[signature] — [illegible]

Jacksonville — [illegible]

David B. Savage, Jr. — Program Manager

December 16, 1995 — Date of Issue

Best Available Copy

1070002
-001-AC

perMits ! Events ! Payment ! Facility ! partY ! Reports ! Help ! eXit

Permitting Application

APMS Facility

! Facility Name: FLORIDA FURNITURE INDUSTRIES, INC. AIRS ID: 1070002
! County: PUTNAM Owner: FLORIDA FURNITURE INDUSTRIES, INC.
! Office: NED JACKSONVILLE Category: POINT

Project

!AIR Permit #: - - Project #: 001 ERA Reference #:
!Permit Office: NED (DISTRICT) Agency Action: Pending
!Project Name: #1 PLANT Desc:
!Type/Sub/Rec: AC /1S Source Emitting 100 tpy or more and Logged: 12-JUN-1996
! Received: 11-JUN-1996 Issued: Expires:
!Fee: 3000.00 Realized: Date: Override: NONE

Related Party

!Role: APPLICANT Begin: 12-JUN-1996 End:
!Name: FLORIDA FURNITURE INDUSTRIES, INC. SSN/FEID: Unavailable
!Addr: P.O. BOX 610
!City: PALATKA State: FL Zip: 32178-0610 Country: U.S.A.
!Phone: 904-329-3444 Fax: 904-329-5455

Processors

!Processor: COLE_J Active: 12-JUN-1996 Inactive:

Press [LIST] for valid Roles for a Party.
Count: ? <List><Replace>

81810 2095

FLORIDA FURNITURE INDUSTRIES, INC.
P.O. BOX 610
PALATKA, FL 32178-0610

63-27/631
345

6-10 19 96

PAY TO THE ORDER OF Fla Dept of Environmental Protection $ 5000.00

FLORIDA FURNITURE INDUSTRIES INC. 5,000 and 00 cts DOLLARS

NationsBank
NationsBank of Florida, N.A.
Orlando, Florida 345

FOR Title V App. Fee

[redacted]

```
AREA: NED                Cash Receiving Application                       CRAP006A
                 Collection Point Log Remittance        Tot:          $5,000.00
+---------------------------------------------------------------------------------
: SYS$REMT: 103873   Type: CP          Recved Date: 11-JUN-1996  Status: RECEIVED :
: SYS$RCPT: 91810    PNR:              Check #: 2095          Amount:     5,000.00 :
: SSN/FEI#:                              Name: FLORIDA FURNITURE INDUSTRIES I    :
:    First:                          Middle:          Title:          Suf:        :
: Address1: P O BOX 610                                   Short Comments:         :
: Address2:                                            RR/BD/1070002(001)         :
:      City: PALATKA                  ST: FL  Zip: 32178-0610 Country:
+--------------------------------------------------------------------------------+
+-------------------------------> P A Y M E N T (S) <-----------------------------
:          Distr                                                              S :
:          CL      Object                  Payment                  Applic/   T
:SYS$PAYT Area.. Code/Description.....: Amount......... Reference#     Fund   A :
:106279    NED    002222 AIR CONSTRUCT         $5,000.00               ARM PFTF  CO:
:                                                                                :
:
:                                                                                :
:
+---------------------------------------------------------------------------------
 COMMIT FREQUENTLY                        $5,000.00  Payment total
Press <TAB> to accept Collection Point or enter F&A.
Count: *1                                                              <Replace>
```

Check Sheet

Company Name: FLORIDA FURNITURE INDUSTRIES
Permit Number: 1070002-001-AC
PSD Number: —
Permit Engineer: HERON

Application:

- [x] Initial Application PALATKA FOR PLANTS NO. 1 & 3
- [x] Incompleteness Letters
- [x] Responses
- [ ] Waiver of Department Action
- [x] Department Response
- [x] Other

Cross References: / NOTES

- [x] WITHDRAWN 11/18/96 FOR PLANT NO. 1 (NO. 3 resubmitted)
- [ ]
- [ ]

Intent:

- [ ] Intent to Issue
- [ ] Notice of Intent to Issue
- [ ] Technical Evaluation
- [ ] BACT Determination
- [ ] Unsigned Permit
- Correspondence with:
  - [ ] EPA
  - [ ] Park Services
  - [ ] Other
- [ ] Proof of Publication
  - [ ] Petitions - (Related to extensions, hearings, etc.)
  - [ ] Waiver of Department Action
  - [ ] Other

Final Determination:

- [ ] Final Determination
- [ ] Signed Permit
- [ ] BACT Determination
  - [ ] Other

Post Permit Correspondence:

- [ ] Extensions/Amendments/Modifications
- [ ] Other

HH '96

P 265 659 157

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Timothy Norman	
Street & Number Muttauer & Assoc	
Post Office, State, & ZIP Code Fla. Furniture Orange Park, Fl	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date FF Plant # 1 2-5-97	

PS Form **3800**, April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Timothy P. Norman, PE
Mgr. Eng. Serv.
Muttauer & Assoc.
1202 Kingsley Ave
Orange Park, FL
32073

4a. Article Number P 265 659 157

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery 2/7

5. Received By: *(Print Name)*

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*
X Johnnie Rodriguez

PS Form **3811**, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

the right of the return address

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

RECEIVED
FEB 12 1997
BUREAU OF
AIR REGULATION

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 5, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy P. Norman, P.E.
Manager, Environmental Services
Mittauer & Associates, Inc.
1202 Kingsley Avenue
Orange Park, Florida 32073

Dear Mr. Norman:

Re: Florida Furniture Industries (FFI) Plant No. 1
PSD and Construction Permit

The Department has reviewed you letter dated January 21, 1997, on behalf of FFI proposing to exempt extension of the existing oven (Plant No.1) from air construction permit requirements. It is our understanding that the extension is required to provide sufficient drying time for the new compliant coating to be used by FFI and that no additional emissions will result from this change. The Department will not require an air construction permit for this change.

If you have any questions regarding this matter, please call me or Teresa Heron at (904) 488-1344.

Sincerely,

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

AAL/th/t

cc: F. H. Rion, FFI
Brian Beals, EPA
Chris Kirts, NED
Jim Pennington, BAR

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

LETTER OF TRANSMITTAL

TO: Teresa Heron
Florida Dept. Of Environmental Protection
Twin Towers Bldg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DATE 1-28-97	PROJECT No. 9110-05-1
RE 11-18-96 Plant No. 1 Letter	

WE ARE SENDING YOU: ☒ Attached ☐ Under Separate Cover Via _____, the following items:

☐ Plans/Prints ☐ Specifications ☐ Originals ☐ Computer Disk ☐ _____

COPIES	DATE	No.	DESCRIPTION
1	11-18-96		Plant No. 1 Letter

THESE ITEMS ARE TRANSMITTED as checked below:

☐ For Your Use ☐ For Your Information ☒ As Requested ☐ For Your Approval ☐ For Your Review and Comment

REMARKS: Plant No. 1 signed and sealed as requested.

COPY TO: _____

SIGNED: _____
Timothy P. Norman, P.E.

If enclosures are not as noted, kindly notify us at once.

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

November 18, 1996

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: Withdrawal of After-the-Fact Construction Permit and PSD Applicability
Air Permitting for Plant No. 1
Florida Furniture Industries
Mittauer & Associates, Inc., Project No. 9110-05-1

Dear Mr. Linero,

On November 7, 1996 a meeting to discuss the air permitting of Florida Furniture Industries Plant Nos. 1 and 3 was held in FDEP's Division of Air Resources Management Office in Tallahassee, Florida. In attendance were the following persons:

C. H. Fancy, P.E.	-	FDEP Tallahassee
A. A. Linero, P.E.	-	FDEP Tallahassee
Jim Pennington, P.E .	-	FDEP Tallahassee
Teresa Heron	-	FDEP Tallahassee
Christopher Kirts, P.E.	-	FDEP Jacksonville
Robert Leetch, P.E.	-	FDEP Jacksonville
Ken Loyless	-	Florida Furniture Industries, Inc.
Eric Herrin	-	Florida Furniture Industries, Inc.
Joe Mittauer, P.E.	-	Mittauer & Associates, Inc.
Tim Norman, P.E.	-	Mittauer & Associates, Inc.

From the lengthy discussions which took place at that meeting, we are providing the following information and make the following requests in regards to Plant No. 1.

We respectfully request to withdraw the after-the-fact construction permit application submitted for Florida Furniture Industries, Inc. Plant No. 1 because no changes to the finish coating operations have occurred since 1974. Also, please refund our $5,000.00 construction permit application fee.

Plant No. 1 originally began operation at its current site in 1930. The plant was in operation prior to 1977 when the "Prevention of Significant Deterioration" (PSD) rules went into effect and no modifications to the finish coating operations have occurred since 1974. Therefore, the plant is not subject to PSD requirements.

In our after-the-fact construction permit application submitted on June 10, 1996 for Plant No. 1, the potential emissions were reported as 2,072 tons/year of which 2,048 tons/year were from the finish coating operations and 24 tons/year were from the dry kilns. Actual 1995 emissions were 246.13 tons/year which is 88% less than the potential to emit stated in the after-the-fact construction permit application. The reason for the large difference between value reported in the permit application as compared to the actual 1995 emissions is due to several reasons. First, the VOC emissions reported in the permit application reflect "potential to emit" and assume 8,760 hrs/year operation. Actual hours of operation of the finish coating operations in 1995 were only 2,042 hours. Second, the company that provides Florida Furniture Industries with all its coating materials, Akzo Nobel Coatings, identified a computer error in its ordering and shipping records which caused the coating materials sold to Florida Furniture Industries to be double counted (see attached letter). Third, the VOC emissions reported for the dry kilns in the permit application assumed southern pine as the wood being dried as opposed to the poplar that is used by Florida Furniture. The VOC emissions for poplar are only 10% of those for southern pine. This coupled with the actual hours of operation at the dry kilns in 1995 results in actual VOC emissions from the dry kilns of 1.35 tons/year as opposed to the 24.0 ton/year in the permit application. Fourth, the hazardous waste shipped from the site, which consists almost entirely of spent cleaning solvents, was not accounted for in the permit application. In 1995, a total of 37.2 tons of hazardous waste was shipped from the Plant No. 1 site. A summary of the emissions data is presented in the following:

PLANT NO. 1 VOC EMISSIONS

ORIGINAL VALUES REPORTED IN PERMIT APPLICATION

Dry Kilns	24	tons/year
Finish Coating Operations	2,048	tons/year
Total	2,072	tons/year

ACTUAL 1995 VOC EMISSIONS

Dry Kilns	1.35	tons/year
Finish Coating Operations	281.98	tons/year
Hazardous Waste Disposed of	- 37.20	tons/year
Total	246.13	tons/year

In order to comply with the MACT Standards, Florida Furniture Industries, Inc. will be shifting to compliant coatings in early 1997 at both Plant No. 1 and Plant No. 3. They are required to be in compliance with the MACT Standards by November 1997. Shifting to compliant coatings should reduce VOC emissions to approximately 100 tons/year at Plant No. 1 based on current coating material usage.

We hope this information is sufficient for FDEP to determine that Plant No. 1 does not require an after-the-fact construction permit and it is not subject to PSD requirements.

Please contact me if you have any questions.

Sincerely,
Mittauer & Associates, Inc.

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

c: Christopher L. Kirts, P.E., N.E. District Air Program Administrator
F. H. Rion, Jr., Florida Furniture Industries, Inc.
Mr. Ken Loyless, Florida Furniture Industries, Inc.

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

November 18, 1996

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: Withdrawal of After-the-Fact Construction Permit and PSD Applicability
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Florida Furniture Industries
Mittauer & Associates, Inc., Project No. 9110-05-1

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Teresa Heron	-	FDEP Tallahassee
Christopher Kirts, P.E.	-	FDEP Jacksonville
Robert Leetch, P.E.	-	FDEP Jacksonville
Ken Loyless	-	Florida Furniture Industries, Inc.
Eric Herrin	-	Florida Furniture Industries, Inc.
Joe Mittauer, P.E.	-	Mittauer & Associates, Inc.
Tim Norman, P.E.	-	Mittauer & Associates, Inc.

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Please contact me if you have any questions.

Sincerely,
Mittauer & Associates, Inc.

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

cc: Christopher L. Kirts, P.E., N.E. District Air Program Administrator
F. H. Rion, Jr., Florida Furniture Industries, Inc.
Mr. Ken Loyless, Florida Furniture Industries, Inc.

cc: J. Pennington
B. Tober
J. Heron

AKZO NOBEL

October 28, 1996

Mr. Ken Loyless
Florida Furniture Industries
Post Office Box 610
Palatka, Florida 32178

Dear Ken:

Akzo Nobel Coatings in High Point, NC has recently provided Florida Furniture with corrected hazardous ingredient report summaries for the last five years. These corrected hazardous ingredient report summaries will indicate that all reportable totals such as gallons, lbs. VOC, lbs. HAPS and lbs. solids will be significantly less than have been previously reported.

A computer programming error has caused all items which were sold to your company on a consignment basis (usually the bulk items) to be double counted. The computer program tracked the shipment of material to your plant and sold as a consignment material as one shipment. However, when the real usage of consignment materials was billed at the end of the month, the computer counted this billing as a second shipment.

Items effected by this computer error are:

403-65C5-261C	Plants 1 & 3
403-10C5-397B	Plants 1 & 3
422-L5-633	Plants 1 & 3
480-X5-1201	Plants 1 & 3
50-X5-1087	Plant 1
500-X5-973	Plant 3

If additional questions develop about this error, please call.

Sincerely,

Bob

Robert C. Matejka
Environmental Manager
Customer Service

Reliance

RCM/jpk

C: G. Bryant
J. Bray
B. Smith

Akzo Nobel Coatings
[illegible] Progress Avenue
P.O. Box [illegible]
High Point, NC [illegible]
Tel. [illegible]
FAX [illegible]

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

Subject: VOC's for Plant No. 1
Project: Air Permitting
Client: Fla. Furn.
Job No: 9110-05-1 Sheet No: _____ of _____
Calculated By: TPN Date: 11/7/96

PLANT NO. 1 - VOC's

ORIGINAL REPORTING VALUES

Dry Kilns	southern pine	24.0 tons/yr
Finish Coating Operations		2,048 tons/yr
TOTAL FOR 8,760 HRS/YR		2,072 tons/yr

REVISED 1995 ACTUAL

Dry Kilns	poplar	1.35 tons/yr
Finish Coating Operations		281.98 tons/yr
TOTAL FOR 2,042 HRS/YR		
Hazardous Waste Disposed of		- 37.20 tons/yr
TOTAL FOR 1995		246.13 tons/yr

1996 PROJECTION

VOC for 1st 9 months = 213.97 tons	284.5 tons
Dry Kilns (estimated)	1.5 tons
Hazardous Waste (estimated)	- 37.2 tons
TOTAL PROJECTED VOC	248.8 tons

1997 + BEYOND PROJECTIONS

Plant No. 1 coatings now have 1.74 # HAPs / # solids. Going to compliant coatings which will have 0.7 # HAPs / # solids. Assume VOC's will be correspondingly reduced: (0.7/1.74)(281.98) + 1.5 - 37.2.

= 78.75 tons ~ 100 TPY HVLP sprayers

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

Subject: VOC's for Plant No. 3
Project: Air Permitting
Client: Fla. Furn.
Job No: 9110-65-1 Sheet No: 2 of
Calculated By: TPM Date: 11/7/96

PLANT NO. 3 VOC's

ORIGINAL REPORTING VALUES

Finish Coating Operations	1,699 tons/yr

REVISED 1995 ACTUAL

Finish Coating Operations	231.52 tons
Hazardous Waste Disposed Of	-23.96 tons
TOTAL FOR 2043 HRS/YR	207.56 tons

1996 PROJECTION

VOC for 1st 9 months = 188.39 tons	251.19 tons
Hazardous Waste Disposed Of (Estimated)	23.96 tons
TOTAL PROJECTED VOC	227.23 tons

1997 + BEYOND PROJECTION

Plant No. 3 Coatings now have 1.66 # HAPs / # solids.
Compliant coatings will have 0.7 # HAPs / # solids.
Assume that VOC will be reduced at the same rate.

$(0.7/1.66)(251.19 \text{ tons}) - 23.96 \text{ tons} = 73.67 \text{ tons}$

what did Teresa say?

P 339 251 167

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to: Timothy Norman	
Street & Number: FlA. Furniture	
Post Office, State, & ZIP Code: Mittauer & Assoc	
Postage: Orange Park, Fl	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date: Plants 1 & 3 Palatka	10-16-96

PS Form **3800**, April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete ... dditional serv...
- Comp... 4a & b.
- Print yo... ...u address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

... ...a fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Timothy P. Norman, P.E.
Mgr., Eng. Services
Mittauer & Assoc., Inc.
1202 Kingsley Ave
Orange Park, Fl 32073

4a. Article Number
P 339 251 167

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
10 ...

ORANGE PARK FL MAIN OFFICE OCT 1996

5. Signature (Addressee)

6. Signature (Agent)
Michael ...

8. Addressee's Address (Only if requested and fee is paid)

PS Form **3811**, December 1991 ✩U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 16, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy P. Norman, P.E.
Manager, Environmental Services
Mittauer & Associates, Inc.
1202 Kingsley Avenue
Orange Park, Florida 32073

Dear Mr. Norman:

Re: Florida Furniture Industries Plants 1 and 3, Palatka
Our Letter of October 1, 1996

This letter is to confirm that the applications submitted in pursuit of PSD construction permits for Plants 1 and 3 are still incomplete. Based on the information submitted, the Department has determined that Plant 3 and, *possibly* Plant 1, are subject to review under the provisions for Prevention of Significant Determination (PSD) given in Rule 62-212.400, F.A.C. and 40 CFR 52.21.

As mentioned in our letter of October 1, we are not reviewing or processing these applications. We will continue the dialogue with your firm or the applicant regarding PSD applicability. It will be necessary at some time in the near future to substantially revise or resubmit these applications to provide sufficient information on rule applicability, emissions, control equipment, etc., consistent with the Standards for Issuing or Denying Permits given in Rule 62-4.070, F.A.C.

If you have any questions regarding this matter, please call me or Teresa Heron at (904) 488-1344.

Sincerely,

10/16

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

AAL/th/t

cc: Brian Beals, EPA
Chris Kirts, NED

Date: 10/15/96 8:37:25 AM
From: Alvaro Linero TAL
Subject: FWD: RE: Florida Furniture Applications
To: See Below

Teresa. Please follow up on the transfer of resposibility for the active FFI applications back to our office. Update the ARMS report in accordance with the actions we have actually taken to-date. Call up Mr. Norman and tell him we have FFI's applications and still consider them to be incomplete. He can update the information over a period of time. Prepare a short letter to FFI telling them that the applications "submitted in pursuit of construction permits for Plants 1 and 3 are still incomplete."

To: Teresa Heron TAL
CC: Clair Fancy TAL
CC: Jim Pennington TAL
CC: Patty Adams TAL
CC: Bob Leetch JAX
CC: Christopher Kirts JAX

Date: 10/11/96 9:48:47 AM
From: Bob Leetch JAX
Subject: Florida Furniture
To: Alvaro Linero TAL
CC: Christopher Kirts JAX
CC: Clair Fancy TAL

Al,

I wanted to follow up our phone conversation of today with my understanding of what was discussed.

The 2 permit applications were electronically transferred from NED to Tallahassee - DARM, as DARM was performing PSD applicability determinations

You have indicated that your are currently transferring the 2 permit applications back to the NED office as of on 10/11? Why are you doing this since you are concurrently asking Fla. Furn. to withdraw the permit applications and resubmit as PSD applications to DARM? It seems that it would be easier for you to keep the applications in your office and for you to handle the paperwork and to ask for the withdrawals

DARM sent out an RAI on 7/9, in relations to the original applications

Fla. Furn. submitted a response, NED carbon copied, received in the NED office on 9/16

The permitting time clock is running from the date of the response

If applications are being transferred back to NED, please note NED will have to act appropriately, we will let you know of our actions prior to initiation

You requested in the 10/1 letter that the applicant should submit PSD applications and appropriate fees directly to Tallahassee-DARM. Based on our most recent telephone conversation and actions that you indicated that you are taking, this seems convoluted

The 10/1 letter was sent to the consultant, Mr. Morgan and actually his name is Mr. Norman.

You do not feel that enforcement is warranted even though the 10/1 letter implies some form of enforcement ("compliance assurance") is needed.

Let me know if you disagree with any of my comments.

Thanks

Bob

P 339 251 159

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Timothy Morgan	
Street & Number Fla. Furniture	
Post Office, State, & ZIP Code Mittauer + Assoc Orange Park, Fl	
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 10-3-96 Plants 143	

PS Form 3800, April 1995

Fold at line over top of envelope to the right of the return address

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Timothy Morgan, Mgr.
Environmental Services
Mittauer + Assoc.
1202 Kingsley Ave.
Orange Park, Fl
32073

4a. Article Number P 339 251 159

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery 10/5/96

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 1,1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy P. Morgan, Manager
Environmental Services
Mittauer & Associates, Inc.
1202 Kingsley Avenue
Orange Park, Florida 32073

Dear Mr. Morgan:

RE: Florida Furniture Industries Plants 1 and 3, Palatka
Your Letter of September 10, 1996

The Department acknowledges receipt of your letter on behalf of Florida Furniture Industries (FFI) regarding the permitting of Plants 1 and 3. Based on a review of the information provided, the Department has determined that Plant 3 is subject to review under the provisions for Prevention of Significant Determination (PSD) given in Rule 62-212.400, F.A.C. and 40CFR52.21.

To determine if PSD applies to Plant 1, we will need to know whether or not the replacement kilns installed in 1985 are larger than those which were destroyed and by how much, if any, the addition of the third kiln (built in 1993) increased VOC emissions.

The previous submittals did not constitute PSD applications. It will be necessary to submit a proper application to our office in Tallahassee with a fee of $7,500 for each plant determined to be a PSD source. We recommend you contact the District office to reconcile the previous applications you sent them as well as the fees.

We recommend that your submittal address the requirements of both PSD and the need to eventually comply with future regulations applicable to existing wood furniture manufacturing plants that emit 50 tons or more of hazardous air pollutants (HAPs) in 1996. The compliance date is November 21, 1997 based on 40 CFR 63, NESHAP. We recommend you consider what the impending Maximum Achievable Control Technology (MACT) requirements will be and their possible impacts on VOC emissions with respect to the PSD/BACT significant levels of 250 tons per year.

The Northeast District will be contacting you in the near future in order to provide you with appropriate compliance assurance information. Please be advised that EPA must be notified of your present situation.

At this time, we are not reviewing or processing any applications for your plants at this office and continue to review the matter for PSD applicability. If you have any questions regarding this matter, please call Al Linero or Jim Pennington at (904) 488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/th/t

cc: Brian Beals, EPA
Chris Kirts, NED
F. H. Rion, FFI

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

September 10, 1996

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.: Response to FDEP Comments dated 7/9/96 for Title V Application
Air Permitting Plants 1 & 3 (FLD No. 31JAX54000201 & 31JAX54002601)
Florida Furniture Industries
Mittauer & Associates, Inc., Project No. 9110-05-1

Dear Mr. Linero,

We have the following responses to the questions/comments contained in your letter dated 7/9/96 for the referenced applications:

GENERAL

Comment No. 1: **Please submit a complete history, in chronological order of the different activities that had the potential to affect air pollution emissions such as construction, operation, modification of operation and expansion, etc. that have occurred at this facility since 1970. A brief description of what was there at the time is also needed.**

Response: Presented in the following is a brief history in chronological order of the different activities that occurred at Plant No. 1 and Plant No. 3 since 1970.

Plant No. 1

1970 - Plant No. 1 was in operation at its present location. Facilities included two dry kilns, the boiler that is still in use today, separator system to control sawdust emissions, and a finish coating operation.

1974 - A new 8,000 SF finishing room was constructed. Existing finish coating equipment as well as new finish coating equipment was installed in this area.

1984 - Existing Dry Kilns Nos. 1 and 2 destroyed by fire. New Dry Kilns Nos. 1 and 2 constructed. Placed in service on January 1, 1985.

1989 - Existing woodworking dust collection system installed to replace existing separator system. Closed-loop system eliminated visible emissions problem.

1993 - Dry Kiln No. 3 was constructed.

Plant No. 3

1985 - Plant was constructed in 1985 and began operation in December 1985. Units originally constructed included boiler, Bag Filter Units A and B, chip cyclone, and finish coating operation.

1992 - Bag Filter Unit C was added to the process.

Comment No. 2: **Submit a process description and a flow diagram showing stacks and emission points.**

Response: The process descriptions for Plant No. 1 and Plant No. 3 are essentially identical except there are no dry kilns at Plant No. 3. A process description is presented in the following:

a. The Dry Kilns are 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 a wood burning boiler. Drying temperature is maintained by controls at 170°F. The only potential emissions from the Kilns are VOC. There is no emissions unit control for the dry kilns.

b. Wood dust from the woodworking operations is pneumatically conveyed under vacuum to the wood dust storage house via a closed loop system. Air is filtered by

Bag Filters prior to being discharged to the atmosphere. The collected wood dust is utilized to fire the steam boilers at each plant. The only potential emissions from the Bag Filters are PM/PM10.

c. Processed wood furniture parts are coated in spray booths using air, airless, air assisted, or HVLP Spray when possible. Also, print coating, dip coating and hand pad staining takes place. Finished product is dried in steam heated ovens in the Finishing Room. Potential emissions include VOCs only. The only emissions control consists of paper mesh with polyester backing filter on spray booths.

d. Separator wood-fired boilers provide steam to each plant for heating of the drying ovens used in finish coating operations and for heating of the manufacturing facilities. In addition at Plant No. 1, the boiler is also utilized for heating of the dry kilns. The boilers are fired by wood chips and sawdust with a multi-cyclone fly ash arrestor and a fly ash re-injection system. The wood-fired boilers have the potential to emit CO, NO_x, and PM. They are not equipped with any emissions control devices for any of the potential pollutants except a fly ash arrestor for PM.

Process flow diagrams for each unit process are included in the permit application packages for each plant. Please refer to the appropriate permit application package.

Comment No. 3: **Are the two plants contiguous, i.e. are they a single facility or at separate locations?**

Response: The two plants are at separate locations. See the facility location plans for each plant (Document ID: 1A and 3A). Also, the longitude and latitude presented for each plant on page 9 of the applications are different thereby indicating that the plants are at different locations.

RULE APPLICABILITY

Comment No. 4: **From the information submitted, it appears the Florida Furniture facilities may be subject to the Prevention of**

Significant Deterioration (PSD) requirements, since volatile organic compounds emissions (2,048 and 1,699 tons per year (TPY) of VOC respectively) for Plants No. 1 and No. 3) are over the 250 tons/year PSD threshold.

A PSD review consists of a determination of Best Available Control Technology (BACT) and, unless otherwise exempted, an analysis of the air quality impact of the emissions. The review also includes an analysis of the project's impact on soils, vegetation and visibility; along with air quality impacts resulting from associated commercial, residential and industrial growth.

If this is the case, you need to submit a complete Best Available Control (BACT) and an air quality impact analysis to cover each PSD pollutant emitted at these facilities. Please have your engineer refer to Chapter 62-212., F.A.C.

In addition, your facility is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAPS) 40 CFR 63, Subpart JJ, Wood Manufacturing Operations which was promulgated on December 7, 1995. Existing affected sources that emit 50 tons or more of Hazardous Air Pollutants (HAPs) in 1996 must comply with the promulgated standards by November 21, 1997. The standards include multiple options for complying with the limits. Please have your engineer refer to this regulation (see attachment) and submit a plan of compliance.

Response:

Using historical net sales figure data back to 1977 and applying the CPI to account for inflation, it appears that Plant No. 1 was exceeding the 250 TPY threshold for VOC emissions when the PSD rules went into effect in 1977. However, no major modifications to the facility have been performed since the PSD rules went into effect that would have increased the facility's potential to emit.

Plant No. 3 crossed the 250 TPY threshold for VOC's sometime in 1991 and is therefore subject to PSD requirements. A PSD review for Plant No. 3 and Plant No. 1 if it is determined to require one will be submitted to FDEP at a later date. Likewise,

the compliance plan for HAPs will be submitted to FDEP at a later date.

EMISSION DATA

Comment No. 5: **Submit emission data based on each individual emission unit. Summarize it in a Table to show a total for the whole facility.**

Response: For Plant No. 1, the emission data on each individual emission unit is summarized as follows:

Plant No. 1
Summary of Potential Emissions Data Based on 8,760 hrs/yr of Operation (TPY)

Pollutant	Dry Kiln No. 1	Dry Kiln No. 2	Dry Kiln No. 3	Bag Filter A	Bag Filter B	Finishing Room	Boiler	TOTAL
CO							58.38	58.38
NO_x							6.44	6.44
VOC	0.82	0.62	0.96			2,048		2,050.4
PM/PM10				4.59	4.59		3.78	12.96
H046						0.0714		0.0714
H047						0.0011		0.0011
H053						0.0185		0.0185
H060						0.0212		0.0212
H066						0.0034		0.0034
H085						74.91		74.91
H095						0.0637		0.0637
H096						42.936		42.936
H113						0.5275		0.5275
H115						46.83		46.83
H120						8.033		8.033
H123						3.539		3.539
H132						0.2167		0.2167
H169						530.62		530.62

H182						0.0029		0.0029
H186						318.914		318.914

For Plant No. 3, the emission data on each individual emission unit is summarized as follows:

Plant No. 3
Summary of Potential Emissions Data Based on 8,760 hrs/yr of Operation (TPY)

Pollutant	Bag Filter A	Bag Filter B	Bag Filter C	Chip Cyclone	Finishing Room	Boiler	TOTAL
CO						32.70	32.70
NO_x							
VOC					1,699		
PM/PM10	3.85	4.18	4.15			2.12	14.30
H046					0.0026		0.0026
H047					0.0013		0.0013
H052					0.012		0.012
H060					0.1068		0.1068
H085					58.20		58.20
H095					0.06715		0.06715
H096					43.95		43.95
H113					0.4375		0.4375
H115					82.51		82.51
H120					9.18		9.18
H123					2.95		2.95
H132					0.1098		0.1098
H169					445.84		445.84
H182					0.0065		0.0065
H186					248.06		248.06

Emission Unit No. 1 - Kiln System

Comment No. 6: **It is not clear (page 30 of application form) if the 24 TPY of VOCs refer to one kiln or three kilns. Please clarify.**

Response: The 24 TPY of VOC's is the total potential VOC's for all three kilns combined assuming the maximum throughput rate for each kiln and 8,760 hours/year operation. Please note that the potential VOC's emitted was calculated using an emission factor of 2.11 lb VOC/1000 bdf. This emission factor has been revised to 0.211 lb VOC/100 bdf due to the fact that Yellow Poplar, a hardwood, is the predominate wood utilized, not Southern Pine. In doing so the combined potential VOC emissions for the Kilns dropped from 24 TPY to 2.4 TPY. See responses to Comment Nos. 5 and No. 7.

Comment No. 7: **What is the basis for the Emission Factor listed of 2.11 lb VOC/1000 bdf?**

Response: The emission factor of 2.11 lb VOC/1000 bdf comes from the publication entitled "AFMA TITLE V ASSISTANCE PROGRAM, DEVELOPMENT OF A COMPREHENSIVE EMISSIONS INVENTORY" prepared by Woodward-Clyde for the American Furniture Manufacturers Association and dated August 1994. The revised emissions factor of 0.211 lb VOC/1000 bdf for Yellow Poplar comes from the same publication. Both of these emission factors have been accepted by regulatory agencies in other states.

Comment No. 8: **What other air pollutant emissions are expected from the operation of the dry kilns?**

Response: No other air pollutants besides VOC's are expected from the dry kilns.

Comment No. 9: **Does each kiln exhaust to individual stack/vent or do all three (3) kilns exhaust to the same stack/vent?**

Response: Each kiln exhausts to individual power roof vents (See Document 1D immediately following page 37).

Emission Unit No. 2 - Woodworking Dust Collection

Comment No. 10: **Describe how captured dust from the baghouses is removed from the system and disposed.**

Response: The dust captured from the baghouses is automatically conveyed by blowers to the cyclone separator where the wood dust falls into a storage house. All of the wood dust collected from Plant No. 1 and most of the wood dust from Plant No. 3 is then conveyed to the wood fired boiler and burned. The system is a completely closed-loop system. Unburned wood dust from Plant No. 3 is disposed of off-site.

Comment No. 11: **What reasonable precautions are used to minimize unconfined particulate matter emissions from these facilities?**

Response: Visual inspections are performed daily to monitor unconfined particulate matter emissions. Preventative maintenance on the dust collection system is also routinely performed. The bag filter system is routinely inspected and the bags are changed as needed. The doors on the dust silo are kept closed to minimize unconfined particulate emissions.

Comment No. 12: **Please submit the most recent record of inspections, maintenance and performance data of the baghouses in operation.**

Response: The baghouses were each tested for visible emissions on 5/17/96. Copies of the test results were included as Documents 1G and 3F in the respective applications. Each of the baghouses are maintained continuously and filter bags are replaced on an as-needed basis. Data for the filter bags has been included in the permit application.

Emission Unit No. 3 - Finish Coating Operations

Comment No. 13: **The emission from these operations are given as 2,048 and 1,699 TPY of VOC from Plants 1 and 3 respectively. These VOC emission rates include pollutants which are both VOC and Volatile Organic Hazardous Air Pollutants (VHAPs). What is the basis of all these estimates?**

Response: The estimates of VOC's are maximum potentials and assume 100% emission of VOC's from coating materials and 8,760 hour/year operation. The actual quantity of hazardous waste shipped was 37.20 and 23.96 tons for Plant Nos. 1 and 3 respectively. Using a potential 8,760 hours of operation this would result in a reduction of 159.7 and 102.9 tons at Plant Nos. 1 and 3 which should be backed out of the above estimates of VOC emissions as should the 21.6 ton reduction at Plant No. 1 which was identified in Comment 6.

Comment No. 14: **Do you have a record format that will show on a daily basis the proposed total coating usage and emissions (lb VOC/gal solids, gal/day used, gal/solid applied, lb VHAPs/lb solids, etc.) for these facilities. Specify the purpose of each coating used (stains, washcoats, sealers, topcoat, basecoats, enamels, thinners, etc.)?**

Response: The Envirocomp Tracking System is being installed at both Plant No. 1 and Plant No. 3. This system will show on a daily basis the proposed total coating usage and emissions. This system will indicate the purpose of each coating used.

Comment No. 15: **What are the emissions from cleaning operations (gun/line, spray booth, wash-off/general cleaning, etc.)?**

Response: The emissions from cleaning operations are basically VOC's generated by the use of lacquer thinner. An estimated 37.20 tons of lacquer thinner at Plant No. 1 and 23.96 tons at Plant No. 3 were utilized in 1995.

Comment No. 16: **How are paint/solvents disposed?**

Response: Spent paint and solvents are taken away from the site as hazardous waste and are hauled and disposed of by a permitted hauler and disposer.

Comment No. 17: **Are the drying ovens mentioned in page 65 of the applications combustion sources?**

Response: The drying ovens are heated by steam from the wood-fired boiler and are therefore not combustion sources.

Emission Unit 4 - Wood Fired Boiler

Comment No. 18: **This emission unit may be subject to applicable provisions of 40 CFR 60, NSPS, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Please refer to this regulation and provide information to confirm its non-applicability.**

Response: The wood fired boiler at Plant No. 1 is not subject to the applicable provisions of 40 CFR 60, NSPS, Subpart Dc-Standards because it was constructed in 1963 which is 23 years prior to the June 9, 1989 cut-off date. Likewise, the wood fired boiler at Plant No. 3 was constructed in December of 1985 which was 3½ years before the June 9, 1989 cut-off date and is therefore also not subject to 40 CFR 60, NSPS, Subpart Dc - Standards.

Comment No. 19: **What combustion practices are used to minimize NO_x, CO, and VOC emissions from the wood-fired boiler?**

Response: Wood-fired boilers used at furniture manufacturing facilities typically burn very clean and produce little in the way of NO_x, CO, and VOC emissions. This is documented in the "EPA Office of Compliance Sector Notebook Project, Profile of the Wood Furniture and Fixtures Industry". Only wood dust is burned in the boilers and only visible emissions are monitored for.

TOXIC REVIEW

Comment No. 20: **Your application stated that these facilities emit numerous HAPs which are listed in 62-210.200 (143), F.A.C.. Emissions of these pollutants may need to be modeled, using Department-approved modeling techniques, to determine maximum predicted impacts for comparison to the Florida Ambient Reference Concentrations (FARCs). Please, estimate the ambient air concentrations (FARCs) using the guidelines developed by the Department.**

Response: The 15 HAPs emitted by Plant No. 1 were modelled using the TSCREEN computer model. Results of this modelling indicate that pollutants H113 Manganese Compounds and H186 Xylenes exceed their annual reference concentrations assuming 8,760 hour

potential mode of operation. However, no attempt was made in the model to factor in the removal efficiency of the paper mesh with polyester backing filter on the spray booths. None of the other 13 HAP exceeded their ambient reference concentrations although H095 Formaldehyde was within 2.5% of exceedance. A copy of the modelling results for Plant No. 1 is attached.

The 15 HAPs emitted by Plant No. 3 were modelled using the TSCREEN computer model. Results of this modelling indicate that pollutant H113 Manganese Compounds may exceed the annual ambient reference concentration under the 8,760 hour potential mode of operation. However, no attempt was made in the model to factor in the removal efficiency of the paper mesh with polyester backing filter on the spray booths. None of the other 14 HAPs exceeded their annual ambient reference concentrations although H096 Glycol Ethers and H186 Xylenes were within 14% and 3.3%, respectively. A copy of the modeling results for Plant No. 3 is included at the end of this section.

Comment No. 21: **Submit MSDS for all HAPs pollutants that have been identified at these facilities.**

Response: Approximately 300 compounds used at the two facilities contain HAPs and with each MSDS containing 7 pages, this will result in the submittal of approximately 8,400 pages for four sets of the MSDS's. Please confirm the desire for this material prior to us printing this much paper.

OPERATION AND MAINTENANCE

Comment No. 22: **Do you have an operation and maintenance plan for the control of the total volatile organic emissions (including HAPS), the collection systems, and the description of the work practice standards. The Operation and Maintenance plan should also include the operator training program and the implementation plan. Please provide a copy of the plan.**

Response: In 40 CFR Part 63.803 it states that the "Work Practice Implementation Plan" shall be developed no more than 60 days after the compliance date of November 21, 1997. A work practice or implementation plan will be submitted to FDEP on or before January 20, 1998.

Please contact me if you have any questions.

Sincerely,
Mittauer & Associates, Inc.

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

cc.: Christopher L. Kirts, P.E., N.E. District Air Program Administrator
F. H. Rion, Jr., Florida Furniture Industries
Mr. Ken Loyless, Florida Furniture Industries

TIER 2 ANALYSIS

PLANT No. 1- RIVER ROAD

FLORIDA FURNITURE INDUSTRIES, INC.

M&A Project No. 9110-05-1

		POTENTIAL EMISSION RATE			AMB. REF. CONC.			
POLLUTANT		8,760 Hr/yr	MAX 1-Hour	Annual	8-Hour	Annual	PTE < ACCEPTABLE	
No.	Name	Tons/yr.	ug/M3	ug/M3	ug/M3	ug/M3	8-Hour	Annual
H046	Chromium compounds	0.0026	0.04	0.003019	5.00	1,000.00	yes	yes
H047	Cobalt compounds	0.0013	0.02	0.00151	1.00	----	yes	yes
H053	Cumene	0.0120	0.17	0.013936	2,460.00	1.00	yes	yes
H060	Dibutylphthalate	0.1068	1.55	0.12403	50.00	100.00	yes	yes
H085	Ethyl Benzene	58.2000	844.87	67.5893	4,340.00	1,000.00	yes	yes
H095	Formaldehyde	0.0672	0.97	0.077983	3.70	0.08	no	yes
H096	Glycol ethers	43.9500	638.00	51.04037	180.00	200.00	no	yes
H113	Manganese compounds	0.4375	6.35	0.508081	50.00	0.05	yes	no
H115	Methanol	82.5100	1197.76	95.82118	2,600.00	----	yes	yes
H120	Methylethyl ketone	9.1500	132.83	10.62615	5,900.00	1,000.00	yes	yes
H123	Methyl isobutyl ketone	2.9500	42.82	3.425918	2,050.00	----	yes	yes
H132	Napthalene	0.1098	1.59	0.127514	500.00	----	yes	yes
H169	Toluene	445.8400	6472.08	517.7665	1,880.00	4,000.00	yes	yes
H182	Vinyl acetate	0.0065	0.09	0.007549	350.00	200.00	yes	yes
H186	Xylenes	248.0600	3600.99	288.0791	4,340.00	80.00	yes	no

SUMMARY OF COLUMN DATA

(1) & (2) Pollutant number and name

(3) Potential emission rate based on 8,760 hours of operation per year

(4) Maximum hour long concentration based on TSCREEN computer model in micrograms per cubic meter

(5) Maximum anual average concentration based on column (4) times a factor of 0.08

(6) & (7) Ambient reference concentrations from "Fla. Air Toxics Working Group", normal acceptable

(8) & (9) Comparison between Potential To Emit and Acceptable Ambient reference concentrations

09/12/96
11:03:49

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 95250 ***

FLA. FURNITURE PLANT NO. 1 VOC EMISSIONS MODEL

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	58.9200
STACK HEIGHT (M)	=	7.6200
STK INSIDE DIAM (M)	=	.9100
STK EXIT VELOCITY (M/S)	=	17.0400
STK GAS EXIT TEMP (K)	=	299.0000
AMBIENT AIR TEMP (K)	=	293.0000
RECEPTOR HEIGHT (M)	=	.0000
URBAN/RURAL OPTION	=	URBAN
BUILDING HEIGHT (M)	=	7.0000
MIN HORIZ BLDG DIM (M)	=	40.0000
MAX HORIZ BLDG DIM (M)	=	101.0000

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	.2973E+05	25.	0.

****
** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **
****

BUOY. FLUX = .694 M**4/S**3; MOM. FLUX = 58.906 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
18.	16.89	5	1.0	1.0	10000.0	33.94	7.77	7.65	NO
100.	.1423E+05	4	3.5	3.5	1120.0	14.52	15.69	13.79	SS
200.	8790.	6	1.0	1.0	10000.0	29.46	22.07	15.36	NO
300.	.1044E+05	6	1.0	1.0	10000.0	29.46	31.80	20.88	NO
400.	9192.	6	1.0	1.0	10000.0	29.46	41.33	26.06	NO
500.	7616.	6	1.0	1.0	10000.0	29.46	50.59	30.87	NO
600.	6289.	6	1.0	1.0	10000.0	29.46	59.60	35.38	NO
700.	5254.	6	1.0	1.0	10000.0	29.46	68.34	39.61	NO
800.	4455.	6	1.0	1.0	10000.0	29.46	76.85	43.60	NO
900.	3833.	6	1.0	1.0	10000.0	29.46	85.12	47.38	NO
1000.	3341.	6	1.0	1.0	10000.0	29.46	93.18	50.98	NO
1100.	2947.	6	1.0	1.0	10000.0	29.46	101.03	54.42	NO
1200.	2625.	6	1.0	1.0	10000.0	29.46	108.68	57.71	NO
1300.	2359.	6	1.0	1.0	10000.0	29.46	116.16	60.87	NO
1400.	2137.	6	1.0	1.0	10000.0	29.46	123.46	63.92	NO

1500.	1949.	6	1.0	1.0	10000.0	29.46	130.59	66.86	NO
1600.	1789.	6	1.0	1.0	10000.0	29.46	137.57	69.70	NO
1700.	1650.	6	1.0	1.0	10000.0	29.46	144.41	72.45	NO
1800.	1530.	6	1.0	1.0	10000.0	29.46	151.10	75.12	NO
1900.	1425.	6	1.0	1.0	10000.0	29.46	157.66	77.72	NO
2000.	1331.	6	1.0	1.0	10000.0	29.46	164.10	80.24	NO
2100.	1249.	6	1.0	1.0	10000.0	29.46	170.41	82.70	NO
2200.	1175.	6	1.0	1.0	10000.0	29.46	176.61	85.10	NO
2300.	1109.	6	1.0	1.0	10000.0	29.46	182.69	87.45	NO
2400.	1050.	6	1.0	1.0	10000.0	29.46	188.67	89.74	NO
2500.	995.7	6	1.0	1.0	10000.0	29.46	194.55	91.98	NO
2600.	946.6	6	1.0	1.0	10000.0	29.46	200.34	94.17	NO
2700.	901.9	6	1.0	1.0	10000.0	29.46	206.03	96.32	NO
2800.	860.9	6	1.0	1.0	10000.0	29.46	211.63	98.43	NO
2900.	823.3	6	1.0	1.0	10000.0	29.46	217.14	100.50	NO
3000.	788.6	6	1.0	1.0	10000.0	29.46	222.57	102.53	NO
3500.	649.8	6	1.0	1.0	10000.0	29.46	248.59	112.17	NO
4000.	550.8	6	1.0	1.0	10000.0	29.46	272.95	121.11	NO
4500.	477.1	6	1.0	1.0	10000.0	29.46	295.88	129.47	NO
5000.	420.2	6	1.0	1.0	10000.0	29.46	317.60	137.34	NO
5500.	375.0	6	1.0	1.0	10000.0	29.46	338.26	144.81	NO
6000.	338.4	6	1.0	1.0	10000.0	29.46	357.99	151.92	NO
6500.	308.2	6	1.0	1.0	10000.0	29.46	376.89	158.72	NO
7000.	282.8	6	1.0	1.0	10000.0	29.46	395.05	165.25	NO
7500.	261.1	6	1.0	1.0	10000.0	29.46	412.55	171.54	NO
8000.	242.5	6	1.0	1.0	10000.0	29.46	429.44	177.61	NO
8500.	226.3	6	1.0	1.0	10000.0	29.46	445.79	183.49	NO
9000.	212.2	6	1.0	1.0	10000.0	29.46	461.63	189.18	NO
9500.	199.6	6	1.0	1.0	10000.0	29.46	477.02	194.72	NO
10000.	188.5	6	1.0	1.0	10000.0	29.46	491.97	200.10	NO
15000.	120.6	6	1.0	1.0	10000.0	29.46	623.67	247.62	NO
20000.	88.51	6	1.0	1.0	10000.0	29.46	733.36	287.44	NO
25000.	69.87	6	1.0	1.0	10000.0	29.46	829.18	322.39	NO
30000.	57.70	6	1.0	1.0	10000.0	29.46	915.28	353.92	NO
40000.	47.32	4	1.0	1.0	320.0	54.14	1552.28	1553.22	NO
50000.	42.08	4	1.0	1.0	320.0	54.14	1745.79	1750.05	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 18. M:

25.	.2973E+05	2	4.0	4.0	1280.0	9.40	8.28	6.32	SS

DIST = DISTANCE FROM THE SOURCE
CONC = MAXIMUM GROUND LEVEL CONCENTRATION
STAB = ATMOSPHERIC STABILITY CLASS (1=A, 2=B, 3=C, 4=D, 5=E, 6=F)
U10M = WIND SPEED AT THE 10-M LEVEL
USTK = WIND SPEED AT STACK HEIGHT
MIX HT = MIXING HEIGHT
PLUME HT= PLUME CENTERLINE HEIGHT
SIGMA Y = LATERAL DISPERSION PARAMETER
SIGMA Z = VERTICAL DISPERSION PARAMETER
DWASH = BUILDING DOWNWASH:
DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

****
*** SCREEN DISCRETE DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
18.	16.89	5	1.0	1.0	10000.0	33.94	7.77	7.65	NO

43.	.2499E+05	3	4.5	4.5	1440.0	10.36	9.38	8.60	SS
100.	.1423E+05	4	3.5	3.5	1120.0	14.52	15.69	13.79	SS
190.	9473.	5	4.5	4.5	10000.0	13.24	20.15	13.41	SS
203.	8931.	6	1.0	1.0	10000.0	29.46	22.36	15.53	NO
300.	.1044E+05	6	1.0	1.0	10000.0	29.46	31.80	20.88	NO
400.	9192.	6	1.0	1.0	10000.0	29.46	41.33	26.06	NO
500.	7616.	6	1.0	1.0	10000.0	29.46	50.59	30.87	NO
600.	6289.	6	1.0	1.0	10000.0	29.46	59.60	35.38	NO
700.	5254.	6	1.0	1.0	10000.0	29.46	68.34	39.61	NO
800.	4455.	6	1.0	1.0	10000.0	29.46	76.85	43.60	NO
900.	3833.	6	1.0	1.0	10000.0	29.46	85.12	47.38	NO
1000.	3341.	6	1.0	1.0	10000.0	29.46	93.18	50.98	NO
1200.	2625.	6	1.0	1.0	10000.0	29.46	108.68	57.71	NO
1500.	1949.	6	1.0	1.0	10000.0	29.46	130.59	66.86	NO
2000.	1331.	6	1.0	1.0	10000.0	29.46	164.10	80.24	NO
2500.	995.7	6	1.0	1.0	10000.0	29.46	194.55	91.98	NO
3000.	788.6	6	1.0	1.0	10000.0	29.46	222.57	102.53	NO
3500.	649.8	6	1.0	1.0	10000.0	29.46	248.59	112.17	NO
4000.	550.8	6	1.0	1.0	10000.0	29.46	272.95	121.11	NO
5000.	420.2	6	1.0	1.0	10000.0	29.46	317.60	137.34	NO
6000.	338.4	6	1.0	1.0	10000.0	29.46	357.99	151.92	NO
7000.	282.8	6	1.0	1.0	10000.0	29.46	395.05	165.25	NO
8000.	242.5	6	1.0	1.0	10000.0	29.46	429.44	177.61	NO
9000.	212.2	6	1.0	1.0	10000.0	29.46	461.63	189.18	NO
10000.	188.5	6	1.0	1.0	10000.0	29.46	491.97	200.10	NO
12000.	153.9	6	1.0	1.0	10000.0	29.46	548.14	220.33	NO
15000.	120.6	6	1.0	1.0	10000.0	29.46	623.67	247.62	NO
20000.	88.51	6	1.0	1.0	10000.0	29.46	733.36	287.44	NO
25000.	69.87	6	1.0	1.0	10000.0	29.46	829.18	322.39	NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** CAVITY CALCULATION - 1 ***			*** CAVITY CALCULATION - 2 ***		
CONC (UG/M**3)	=	.0000	CONC (UG/M**3)	=	.0000
CRIT WS @10M (M/S)	=	99.99	CRIT WS @10M (M/S)	=	99.99
CRIT WS @ HS (M/S)	=	99.99	CRIT WS @ HS (M/S)	=	99.99
DILUTION WS (M/S)	=	99.99	DILUTION WS (M/S)	=	99.99
CAVITY HT (M)	=	7.00	CAVITY HT (M)	=	7.00
CAVITY LENGTH (M)	=	38.36	CAVITY LENGTH (M)	=	28.82
ALONGWIND DIM (M)	=	40.00	ALONGWIND DIM (M)	=	101.00

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

****
*** END OF SCREEN MODEL OUTPUT ***
****

TIER 2 ANALYSIS

PLANT No. 3- COMFORT ROAD

FLORIDA FURNITURE INDUSTRIES, INC.

M&A Project No. 9110-05-1

		POTENTIAL EMISSION RATE			AMB. REF. CONC.			
POLLUTANT		8,760 Hr/yr	MAX 1-Hour	Annual	8-Hour	Annual	PTE<ACCEPTABLE	
No.	Name	Tons/yr.	ug/M3	ug/M3	ug/M3	ug/M3	8-Hour	Annual
H046	Chromium compounds	0.0026	0.01	0.000811	5.00	1,000.00	yes	yes
H047	Cobalt compounds	0.0013	0.01	0.000405	1.00	----	yes	yes
H053	Cumene	0.0120	0.05	0.003741	2,460.00	1.00	yes	yes
H060	Dibutylphthalate	0.1068	0.42	0.033296	50.00	100.00	yes	yes
H085	Ethyl Benzene	58.2000	226.81	18.14442	4,340.00	1,000.00	yes	yes
H095	Formaldehyde	0.0672	0.26	0.020935	3.70	0.08	yes	yes
H096	Glycol ethers	43.9500	171.27	13.70185	180.00	200.00	yes	yes
H113	Manganese compounds	0.4375	1.70	0.136395	50.00	0.05	yes	no
H115	Methanol	82.5100	321.54	25.72331	2,600.00	----	yes	yes
H120	Methylethyl ketone	9.1500	35.66	2.852603	5,900.00	1,000.00	yes	yes
H123	Methyl isobutyl ketone	2.9500	11.50	0.919692	2,050.00	----	yes	yes
H132	Napthalene	0.1098	0.43	0.034231	500.00	----	yes	yes
H169	Toluene	445.8400	1737.44	138.995	1,880.00	4,000.00	yes	yes
H182	Vinyl acetate	0.0065	0.03	0.002026	350.00	200.00	yes	yes
H186	Xylenes	248.0600	966.69	77.33515	4,340.00	80.00	yes	yes

SUMMARY OF COLUMN DATA

(1) & (2) Pollutant number and name

(3) Potential emission rate based on 8,760 hours of operation per year

(4) Maximum hour long concentration based on TSCREEN computer model in micrograms per cubic meter

(5) Maximum anual average concentration based on column (4) times a factor of 0.08

(6) & (7) Ambient reference concentrations from "Fla. Air Toxics Working Group", normal acceptable

(8) & (9) Comparison between Potential To Emit and Acceptable Ambient reference concentrations

09/10/96
15:56:25

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 95250 ***

Fla. Furn. Plant 3 - 1,699 TPY of VOC

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	48.8700
STACK HEIGHT (M)	=	8.2300
STK INSIDE DIAM (M)	=	.6100
STK EXIT VELOCITY (M/S)	=	42.0400
STK GAS EXIT TEMP (K)	=	293.0000
AMBIENT AIR TEMP (K)	=	293.0000
RECEPTOR HEIGHT (M)	=	.0000
URBAN/RURAL OPTION	=	URBAN
BUILDING HEIGHT (M)	=	5.8000
MIN HORIZ BLDG DIM (M)	=	110.0000
MAX HORIZ BLDG DIM (M)	=	151.0000

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	6621.	327.	0.

****
** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **
****

BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = 164.409 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
119.	4714.	4	8.0	8.0	2560.0	12.75	18.60	16.37	SS
200.	4611.	6	1.0	1.0	10000.0	33.54	22.37	15.79	NO
300.	6559.	6	1.0	1.0	10000.0	33.54	32.01	21.20	NO
400.	6324.	6	1.0	1.0	10000.0	33.54	41.49	26.31	NO
500.	5512.	6	1.0	1.0	10000.0	33.54	50.73	31.09	NO
600.	4696.	6	1.0	1.0	10000.0	33.54	59.71	35.57	NO
700.	4005.	6	1.0	1.0	10000.0	33.54	68.44	39.77	NO
800.	3445.	6	1.0	1.0	10000.0	33.54	76.93	43.75	NO
900.	2995.	6	1.0	1.0	10000.0	33.54	85.20	47.52	NO

1000.	2632.	6	1.0	1.0	10000.0	33.54	93.25	51.11	NO
1100.	2335.	6	1.0	1.0	10000.0	33.54	101.09	54.54	NO
1200.	2091.	6	1.0	1.0	10000.0	33.54	108.74	57.82	NO
1300.	1887.	6	1.0	1.0	10000.0	33.54	116.21	60.98	NO
1400.	1715.	6	1.0	1.0	10000.0	33.54	123.51	64.02	NO
1500.	1569.	6	1.0	1.0	10000.0	33.54	130.64	66.96	NO
1600.	1443.	6	1.0	1.0	10000.0	33.54	137.62	69.79	NO
1700.	1334.	6	1.0	1.0	10000.0	33.54	144.45	72.54	NO
1800.	1239.	6	1.0	1.0	10000.0	33.54	151.15	75.21	NO
1900.	1155.	6	1.0	1.0	10000.0	33.54	157.71	77.80	NO
2000.	1081.	6	1.0	1.0	10000.0	33.54	164.14	80.33	NO
2100.	1016.	6	1.0	1.0	10000.0	33.54	170.45	82.78	NO
2200.	956.7	6	1.0	1.0	10000.0	33.54	176.64	85.18	NO
2300.	903.8	6	1.0	1.0	10000.0	33.54	182.73	87.52	NO
2400.	856.0	6	1.0	1.0	10000.0	33.54	188.71	89.81	NO
2500.	812.7	6	1.0	1.0	10000.0	33.54	194.59	92.05	NO
2600.	773.2	6	1.0	1.0	10000.0	33.54	200.37	94.24	NO
2700.	737.2	6	1.0	1.0	10000.0	33.54	206.06	96.39	NO
2800.	704.1	6	1.0	1.0	10000.0	33.54	211.66	98.50	NO
2900.	673.7	6	1.0	1.0	10000.0	33.54	217.17	100.56	NO
3000.	645.7	6	1.0	1.0	10000.0	33.54	222.60	102.59	NO
3500.	533.1	6	1.0	1.0	10000.0	33.54	248.62	112.23	NO
4000.	452.6	6	1.0	1.0	10000.0	33.54	272.97	121.16	NO
4500.	392.5	6	1.0	1.0	10000.0	33.54	295.91	129.52	NO
5000.	346.0	6	1.0	1.0	10000.0	33.54	317.62	137.39	NO
5500.	309.1	6	1.0	1.0	10000.0	33.54	338.28	144.85	NO
6000.	279.1	6	1.0	1.0	10000.0	33.54	358.01	151.96	NO
6500.	254.2	6	1.0	1.0	10000.0	33.54	376.91	158.76	NO
7000.	233.4	6	1.0	1.0	10000.0	33.54	395.07	165.29	NO
7500.	215.6	6	1.0	1.0	10000.0	33.54	412.56	171.58	NO
8000.	200.3	6	1.0	1.0	10000.0	33.54	429.46	177.65	NO
8500.	187.0	6	1.0	1.0	10000.0	33.54	445.80	183.52	NO
9000.	175.3	6	1.0	1.0	10000.0	33.54	461.65	189.22	NO
9500.	165.0	6	1.0	1.0	10000.0	33.54	477.03	194.75	NO
10000.	155.8	6	1.0	1.0	10000.0	33.54	491.99	200.13	NO
15000.	99.80	6	1.0	1.0	10000.0	33.54	623.68	247.65	NO
20000.	73.29	6	1.0	1.0	10000.0	33.54	733.37	287.46	NO
25000.	57.87	6	1.0	1.0	10000.0	33.54	829.19	322.41	NO
30000.	47.80	6	1.0	1.0	10000.0	33.54	915.28	353.93	NO
40000.	39.25	4	1.0	1.0	320.0	85.16	1552.38	1553.32	NO
50000.	34.90	4	1.0	1.0	320.0	85.16	1745.88	1750.14	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 119. M:

327.	6621.	6	1.0	1.0	10000.0	33.54	34.69	22.67	NO

DIST = DISTANCE FROM THE SOURCE
CONC = MAXIMUM GROUND LEVEL CONCENTRATION
STAB = ATMOSPHERIC STABILITY CLASS (1=A, 2=B, 3=C, 4=D, 5=E, 6=F)
U10M = WIND SPEED AT THE 10-M LEVEL
USTK = WIND SPEED AT STACK HEIGHT
MIX HT = MIXING HEIGHT
PLUME HT= PLUME CENTERLINE HEIGHT
SIGMA Y = LATERAL DISPERSION PARAMETER
SIGMA Z = VERTICAL DISPERSION PARAMETER
DWASH = BUILDING DOWNWASH:
DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

****
*** SCREEN DISCRETE DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
119.	4714.	4	8.0	8.0	2560.0	12.75	18.60	16.37	SS
500.	5512.	6	1.0	1.0	10000.0	33.54	50.73	31.09	NO
1000.	2632.	6	1.0	1.0	10000.0	33.54	93.25	51.11	NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** CAVITY CALCULATION - 1 ***			*** CAVITY CALCULATION - 2 ***		
CONC (UG/M**3)	=	.0000	CONC (UG/M**3)	=	.0000
CRIT WS @10M (M/S)	=	99.99	CRIT WS @10M (M/S)	=	99.99
CRIT WS @ HS (M/S)	=	99.99	CRIT WS @ HS (M/S)	=	99.99
DILUTION WS (M/S)	=	99.99	DILUTION WS (M/S)	=	99.99
CAVITY HT (M)	=	5.80	CAVITY HT (M)	=	5.80
CAVITY LENGTH (M)	=	35.19	CAVITY LENGTH (M)	=	33.53
ALONGWIND DIM (M)	=	110.00	ALONGWIND DIM (M)	=	151.00

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

****
*** END OF SCREEN MODEL OUTPUT ***
****

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
1202 Kingsley Avenue
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

LETTER OF TRANSMITTAL

TO: Al Linero, P.E.
Dept. of Environmental Protection
2600 Blairstone Rd., MS 5505
Tallahassee, FL 32399

DATE 9/13/96 | PROJECT No. 9110-05-1
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Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

August 6, 1996

Mr. Ken Loyless, Safety Director
Florida Furniture Industries, Inc.
Post Office Box 610
Palatka, Florida 32078-0610

Dear Mr. Loyless:

Putnam County - AP
Florida Furniture Industries, Inc.

This letter is a follow-up to our July 25, 1996 meeting and tour of the Florida Furniture Furnishings facility on River Road in Palatka. I would like to thank you and your staff and Mr. Mittauer and Mr. Norman in attending the meeting to discuss permitting and compliance issues as they relate to VOC emissions from the two Florida Furniture Industries facilities. As we recommended to you during the meeting it would be advisable to check further into other furniture manufacturers to find what factories they used and are accepted to make determinations of VOC emissions. As we discussed you may need to further review your own process data for VOC's that are bought and used during a calendar year. One last item that was discussed was that you would send all the additional information requested in the July 9 letter from Mr. Linero to him no later than September 16, 1996. Please send a copy to me at the Northeast District Office. Also, please send the information requested by Mr. Tober directly to him in Tallahassee.

If you have any questions concerning this matter, please contact me at (904) 448-4310, extension 234.

Sincerely,

Robert J. Leetch, P.E.
District Air Program

cc: Dennis Tober
Joe Mittauer, P.E.
Al Linero, P.E.
CC: T. Heron

Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

July 12, 1996

CERTIFIED MAIL - RETURN RECEIPT

Mr. F.H. Rion Jr., General Manager
Florida Furniture Industries, Inc.
Post Office Box
Palatka, Florida 32178

Dear Mr. Rion:

Putnam County - AP
Florida Furniture Industries, Inc.
Construction/PSD Permit Applications
#1 Plant ID# 1070002
#3 Plant ID# 1070026

In regards to the Title V permit application, no action will be initiated, pending resolution of PSD and "after-the-fact" construction permit issues.

Prevention of Significant Deterioration (PSD), Best Available Control Technology (BACT) determinations and "after-the-fact" construction permit applicability will be processed by the Departments Division of Air Resources Management office in Tallahassee.

The Title V permit application review pursuant to Rule 62-213, Florida Administrative Code, will be conducted in the Department's District office in Jacksonville. If you have any questions concerning this matter, please contact Robert Leetch at (904) 448-4310, extension 234.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

cc: Al Linero, P.E.
John Brown
Jim Pennington
Joe Mittauer, P.E.

P 339 251 123

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to	F H Rion
Street & Number	Fla. Furniture
Post Office, State, & ZIP Code	Palatka, Fl
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	7-10-96

PS Form **3800**, April 1995

Is your **RETURN ADDRESS** completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
F. H. Rion, General Mgr.
Fla. Furniture Ind.
PO Box 610
Palatka, Fl 32178

4a. Article Number
P 339 251 123

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
7-12-96

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
Frank McCoy

PS Form **3811**, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 9, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. F. H. Rion Jr., General Manager
Florida Furniture Industries, Inc.
Post Office Box 610
Palatka, Florida 32178

Dear Mr. Rion:

Re: Florida Furniture Industries, Inc.
Applications for Title V Air Permit
FID No. 31JAX5400201 and 31JAX54002601

The Department has reviewed the above referenced applications which were referred to this Bureau by the Department's Northeast District office. Each plant may need an after-the-fact construction permit for an air pollution source to account for unpermitted emissions of Volatile Organic Compounds (VOCs) resulting from production changes over the past 20 or more years. It may also be necessary to conduct a review pursuant to the Prevention of Significant Deterioration (PSD) and a Best Available Control Technology Determination (BACT) particularly for Plant 3.

The information provided in your Title V permit application is insufficient for the Department to make a determination as to the applicability of our construction review procedures or the PSD process. Therefore the application is incomplete. Pursuant to Rules 62-210, 62-212, 62-272, 62-275, 62-296, 62-297 and 62-4.070, F.A.C., please submit the following information to the Department, including all assumptions, reference materials and calculations:

GENERAL

1. Please submit a complete history, in chronological order of the different activities that had the potential to affect air pollution emissions such as construction, operation, modification of operation and expansion, etc. that have occurred at this facility since 1970. A brief description of what was there at the time is also needed.

2. Submit a process description and a flow diagram showing stacks and emission points.

3. Are the two plants contiguous, i.e. are they a single facility or at separate locations?

RULE APPLICABILITY

4. From the information submitted, it appears the Florida Furniture facilities may be subject to the Prevention of Significant Deterioration (PSD) requirements, since volatile organic compounds emissions (2,048 and 1,699 tons per year (TPY) of VOC respectively) for Plants No. 1 and No. 3) are over the 250 tons/year PSD threshold.

A PSD review consists of a determination of Best Available Control Technology (BACT) and, unless otherwise exempted, an analysis of the air quality impact of the emissions. The review also includes an analysis of the project's impact on soils, vegetation and visibility; along with air quality impacts resulting from associated commercial, residential and industrial growth.

If this is the case, you need to submit a complete Best Available Control (BACT) and an air quality impact analysis to cover each PSD pollutant emitted at these facilities. Please have your engineer refer to Chapter 62-212., F.A.C.

In addition, your facility is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAPS) 40 CFR 63, Subpart JJ, Wood Manufacturing Operations which was promulgated on December 7, 1995. Existing affected sources that emit 50 tons or more of Hazardous Air Pollutants (HAPs) in 1996 must comply with the promulgated standards by November 21, 1997. The standards include multiple options for complying with the limits. Please have your engineer refer to this regulation (see attachment) and submit a plan of compliance.

EMISSION DATA

5. Submit emission data based on each individual emission unit. Summarize it in a Table to show a total for the whole facility.

Emission Unit No. 1 - Kiln System

6. It is not clear (page 30 of application form) if the 24 TPY of VOCs refer to one kiln or three kilns. Please clarify.

7. What is the basis for the Emission Factor listed of 2.11 lb VOC/1000 bdf?

8. What other air pollutant emissions are expected from the operation of the dry kilns?

9. Does each kiln exhaust to individual stack/vent or do all three (3) kilns exhaust to the same stack/vent?

Emission Unit No. 2 - Woodworking Dust Collection

10. Describe how captured dust from the baghouses is removed from the system and disposed.

11. What reasonable precautions are used to minimize unconfined particulate matter emissions from these facilities?

12. Please submit the most recent record of inspections, maintenance and performance data of the baghouses in operation.

Emission Unit No. 3 - Finish Coating Operations

13. The emission from these operations are given as 2,048 and 1,699 TPY of VOC from Plants 1 and 3 respectively. These VOC emission rates include pollutants which are both VOC and Volatile Organic Hazardous Air Pollutants (VHAPs). What is the basis of all these estimates?

14. Do you have a record format that will show on a daily basis the proposed total coating usage and emissions (lb VOC/gal solids, gal/day used, gal/solid applied, lb VHAPs/lb solids, etc.) for these facilities. Specify the purpose of each coating used (stains, washcoats, sealers, topcoat, basecoats, enamels., thinners, etc.)

15. What are the emissions from cleaning operations (gun/line, spray booth, washoff/general cleaning, etc.)?

16. How are paint/solvents disposed?

17. Are the drying ovens mentioned in page 65 of the applications combustion sources?

Emission Unit 4 - Wood Fired Boiler

18 This emission unit may be subject to applicable provisions of 40 CFR 60, NSPS, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Please refer to this regulation and provide information to confirm its non-applicability.

19. What combustion practices are used to minimize NO_x, CO, and VOC emissions from the wood-fired boiler?

TOXIC REVIEW

20. Your applications stated that these facilities emit numerous HAPs which are listed in 62-210.200 (143), F.A.C. Emissions of these pollutants may need to be modeled, using Department-approved modeling techniques, to determine maximum predicted impacts for comparison to the Florida Ambient Reference Concentrations (FARCs). Please, estimate the ambient air concentrations (FARCs) using the guidelines developed by the Department.

21. Submit MSDS for all HAPs pollutants that have been identified at these facilities.

OPERATION AND MAINTENANCE

22. Do you have an operation and maintenance plan for the control of the total volatile organic emissions (including HAPS), the collection systems, and the description of the work practice standards. The Operation and Maintenance plan should also include the operator training program and the implementation plan. Please provide a copy of the plan.

Based on the data in the original Title V applications, it appears these facilities may be subject to the PSD regulations. Please submit a complete PSD application for each Plant which meets the PSD review requirements. The Department can make the PSD applicability determination for you if you submit the information requested above. The Department will conduct another completeness review of revised applications as soon as they are received. If they are not subject to PSD, we will forward them to our Northeast District office for action.

If you have any questions regarding this matter, please call Teresa Heron (Review Engineer), Cleve Holladay (meteorologist), or myself at (904) 448-1344.

Sincerely,

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

AAL/th/t

cc: J. Mittauer, P.E.
C. Kirts, NED
J. Brown, BAR
J. Pennington, BAR

Fla. Furniture File

Date: 6/25/96 17:17
From: Alvaro Linero TAL
Subject: Florida Furniture - Palatka
To: See Below

Bob Leetch and Johnny Cole sent me two applications from Florida Furniture Inc., manufacturers of wood bedroom furniture in Palatka The applications are for Title V permits, but I understand they will resubmit some additional pages and present them as after-the-fact construction permits due to emissions of VOCs which were not reflected in previous permits.

It looks like the facility has been in operation since 1933 with several expansions and replacements since then (and at least as recently as 1985).

I expect to send a long completeness letter, which must go out by July 10. The VOC and HAPs emissions (in TPY) are as follows for Plant 1:

VOCs	2,048	Chromium Compounds	0.07
Cobalt Compounds	0.001	Cumene	0.19
Dibutylphthalate	0.021	Diethanolamine	0.003
Ethyl Benzene	74.9	Formaldehyde	0.06
Glycol Ethers	42.9	Manganese Compounds	0.53
Methanol	46.8	Methyl Ethyl Ketone	8.0
Methyl Isobutyl K.	3.5	Naphthalene	0.2
Toluene	530	Vinyl Acetate	0.002
Xylenes	319		

I won't bother listing out Plant 2 except to say that VOCs are 1,699 TPY.

This may well be a compliance assurance problem, especially if it turns out they built or added to the facility since the PSD rules were enacted. At the same time, it looks to me as if a Wood Furniture Coating MACT was finalized on 12/7/95. No doubt we will need to compare ambient concentrations of a number of pollutants to the FARCs.

I need to get help from each program in conducting our review for applicability of Department rules and guidances. Copies of the applications are available at the District. I'll make some for Tallahassee personnel. Just let me know who needs one and I'll be happy to oblige or let that person borrow mine.

I will ask Teresa Heron to coordinate permitting if this indeed does become a PSD matter. Otherwise, it will go back to the District.

To: Jim Pennington TAL
To: Christopher Kirts JAX
To: Morton Benjamin JAX
To: John Brown TAL
To: Larry George TAL
CC: John Glunn TAL
CC: Cindy Phillips TAL
CC: Teresa Heron TAL
CC: Johnny Cole JAX
CC: Bob Leetch JAX