

FINAL DETERMINATION

Florida Furniture, Inc.
Consolidation of Wood Furniture Finish Coating Operations
for Plants 1 and 3
Air Construction Permit No. 1070026-003-AC

The Department distributed a public notice package on June 4, 2001 for the consolidation of Florida Furniture, Inc.'s wood furniture finish coating operations for Plants 1 and 3 at a single location (Plant 3) in Palatka, Putnam County. Plant 1 is located at 722 River Street while the address of Plant 3 is 160 Comfort Road. The permit consolidates the two plants into a single facility consistent with federal and state rules while allowing no increase in aggregated emissions from the two sites.

The Public Notice of Intent to Issue was published in the Daily News on June 11, 2001. No public comments were received during the 14-day comment period. Therefore the final action of the Department is to issue the permit as drafted.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit by:


Mr. William A. Cratch
Florida Furniture Industries, Inc.
P.O. Box 610
Palatka, Florida 32178

DEP File No. 1070026-003-AC
Consolidation of Plants 1 and 3
Putnam County

Enclosed is the Final Permit Number 1070026-003-AC to consolidate Florida Furniture Industries' Plant No. 1 and Plant No. 3 as a single facility. Plant No. 1 is located at 722 River Street; Plant No. 3 is located at 160 Comfort Road, Palatka, Putnam County. Emissions sources include wood working areas, finish coating operations (moved to Plant 3), drying kilns, and 2 wood-fired boilers. Total volatile organic compounds (VOC) emissions from the aggregated facility will be limited to 371.55 tons per year (TPY) by limiting the annual operation to 2,450 hours and establishing limits on volatile components of coatings and solvents. Emission control equipment consists of bag filters for woodworking dust emissions and polyethylene-paper filters for reducing spraying emissions. The facility is subject to Maximum Achievable Control Technology (MACT) standards required by 40 CFR 63, Subpart JJ.

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

Executed in Tallahassee, Florida.


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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7/9/01 to the person(s) listed:

William A. Cratch, FFI*
Tim Norman, P.E.
Gregg Worley, EPA
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52,
Florida Statutes, with the designated Department
Clerk, receipt of which is hereby acknowledged.

Charlotte J. Hayes 7/9/01
(Clerk) (Date)



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PERMITTEE:

Florida Furniture Industries, Inc.
Wood Furniture Manufacturing Facility
Post Office Box 610
Palatka, Florida 32178

FID No.	1070026
SIC No.	2511
Permit No.	1070026-003-AC
Project:	Plant Consolidation
Expires:	December 31, 2001

Authorized Representative:
Mr. William A. Cratch
Vice President/Operations

PROJECT AND LOCATION:

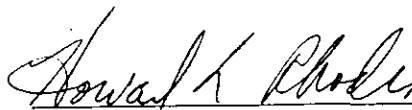
Air construction permit for consolidation of existing operations at wood furniture manufacturing Plants 1 and 3 located at 722 River Street (Plant 1) and 160 Comfort Road (Plant 3), Palatka, Putnam County. UTM coordinates are Zone 17; 438.3 km E (Plant 1), 436.4 km E (Plant 3); 3278.9 km N (Plant 1), 3283.4 km N (Plant 3).

STATEMENT OF BASIS:

This air construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to construct/operate the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendices made a part of this permit:

Appendix GC Construction Permit General Conditions


Howard L. Rhodes, Director
Division of Air Resources
Management

"More Protection, Less Process"

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AIR CONSTRUCTION PERMIT 1070026-003-AC

SECTION I - FACILITY INFORMATION

FACILITY DESCRIPTION

The applicant's wood furniture operations consist of two manufacturing plants located approximately 2.75 miles apart in Palatka, Putnam County. The plants are located next to the St. John's River and are separated for the most part by undeveloped riverfront acreage. Plant 1 (Facility ID No. 1070002) began operation in 1934 and consists of a wood waste boiler (Emission Unit 001), three dry kilns (Emission Unit 002), and woodworking operations (Emission Unit 003). Plant 3 (Facility ID No. 1070026) began operation in 1985 and consists of finish coating operations (Emission Unit 004), a wood waste boiler (Emission Unit 005) and woodworking operations (Emission Units 006). Emission control equipment consists of bag filters for woodworking dust emissions and polyethylene-paper filters for reducing spraying emissions. This air construction permit will consolidate operations in a single facility.

EMISSIONS UNITS

This permit addresses the following emissions units:

EMISSION UNIT NO.	SYSTEM	EMISSION UNIT DESCRIPTION
001	Plant #1 Wood-waste Boiler	Wood-burning boiler fed by wood chips and sawdust. Boiler provides steam for kilns and for space heating.
002	Plant #1 Dry Kilns (#1,2,3)	Steam-heated kilns used for wood processing.
003	Plant # 1 Wood Working Area	Dust collection unit (Bag filters A and B). Chip Cyclone separates wood chips from the wood hog chipping operation.
004	Plant #3 Finish Coating Operations	Wood parts produced at Plants # 1 and #3 are coated in spray booths using air, airless, air assisted or HVLP spray where possible. Also includes print coating, dip coating and hand staining. Finished product is dried in steam-heated ovens in the Finishing Room.
005	Plant #3 Wood-waste Boiler	Wood-burning boiler fed by wood chips and sawdust. Boiler provides steam for drying ovens in the finish coating operations and for space heating.
006	Plant # 3 Wood Working Area	Dust collection unit (Bag filters A, B, C and D). Chip Cyclone separates wood chips from the wood hog chipping operation.

REGULATORY CLASSIFICATION

This facility is classified as a "Major Source of Air Pollution or Title V Source" due to emissions being greater than 250 tons per year of volatile organic compounds and 25 tons per year of hazardous air pollutants. The facility is subject to 40 CFR 63, National Emission Standards for Hazardous Air Pollutants, Subpart JJ, Wood Furniture Manufacturing Operations.

PERMIT SCHEDULE/RELEVANT DOCUMENTS

- Application Received March 20, 2001
- Application Deemed Complete March 20, 2001
- Public Notice Package Mailed June 4, 2001
- Proof of Publication Received June 18, 2001
- Final Permit Issued July 9, 2001

Florida Furniture Industries, Inc.
Palatka, Florida

Wood Furniture Plant Consolidation
Permit No. 1070026-003-AC

SECTION II – ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114.
2. Compliance Authority: All documents related to operation, reports, tests, and notifications should be submitted to the DEP Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590, phone 904/448-4300 and Northeast District Branch Office, 101 NW 75th Street, Suite 3, Gainesville, Florida, phone 352/333-2850.
3. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
4. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
5. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
6. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212, F.A.C.]
7. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. Permit Expiration Date: The permit expiration date of December 31, 2001 will allow time for submittal of a new Title V permit application to the Department.
9. Permit Expiration Date Extension: The permittee, for good cause, may request that this permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.080, F.A.C.).
10. BACT Determination: In conjunction with any increase in potential to emit, hours of operation, or annual emissions, the permittee may be required to submit an application for determination of best available control technology for the source. The permittee formerly requested and received a synthetic minor source classification for VOC emissions. Therefore, any net increase in VOC/VHAP emissions of 1.0 TPY above the allowable limitations established herein will initiate preconstruction review requirements pursuant to Rule 62-212.400(5), F.A.C., as if construction of these emissions units had not yet begun. [Rules 62-212.400(2)(g) and 62-212.400(5), F.A.C.]

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11. Application for Title V Permit: An application for a new Title V operating permit covering Plants 1 and 3 as a single facility must be submitted to the Department's Northeast District Office. [Chapter 62-213, F.A.C.]
12. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
13. Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All plant operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]
14. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without the applicable air control device operating properly. [Rule 62-210.650, F.A.C.]
15. Unconfined Particulate Matter Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]
16. Test Notification: The permittee shall notify each Compliance Authority in writing at least 30 days prior to any initial performance tests and at least 15 days prior to any other required tests. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and conducting the test. [Rule 62-297.310(7)(a)9., F.A.C. and 40 CFR 60.7, 60.8]
17. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
18. Applicable Test Procedures
 - a. Required Sampling Time. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be sixty (60) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur. [Rule 62-297.310(4)(a)1. and 2., F.A.C.]
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet. [Rule 62-297.310(4)(b), F.A.C.]
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C. [Rule 62-297.310(4)(d), F.A.C.]
19. Determination of Process Variables
 - a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine

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determine the compliance of the emissions unit with applicable emission limiting standards. [Rule 62-297.310(5)(a), F.A.C.]

b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5)(b), F.A.C.]

20. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
21. Stack Testing Facilities: Required stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C. [Rule 62-297.310]
22. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2)(b), F.A.C.]
23. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]
24. Emissions Performance Test Results Reports: A report indicating the results of any required emissions performance test shall be submitted to each Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
25. Annual Operating Reports: The permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the Department's Northeast District Office by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

SECTION III – EMISSIONS UNITS SPECIFIC CONDITIONS

APPLICABLE STANDARDS AND REGULATIONS

1. **Regulations:** Unless otherwise indicated in this permit, the construction and operation of the subject emission units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-17, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Part 63.
2. **Applicable Requirements:** Issuance of a permit does not relieve the owner or operator of an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law, notwithstanding that these applicable requirements are not explicitly stated in this permit. In cases where there is an ambiguity or conflict in the specific conditions of this permit with any of the above-mentioned regulations, the more stringent local, state, or federal requirement applies. [Rules 62-204.800 and Rules 62-210.300 and 62-4.070 (3) F.A.C.]
3. The following emission units are subject to the specific conditions listed in this section:

NO.	SYSTEM	EMISSION UNIT DESCRIPTION
001	#1 Wood-waste Boiler	Wood-burning boiler fed by wood chips and sawdust. Boiler provides steam for kilns and for space heating.
002	Dry Kilns (#1,2,3)	Steam-heated kilns used for wood processing.
003	# 1 Wood Working Area	Dust collection unit (Bag filters A and B). Chip Cyclone separates wood chips from the wood hog chipping operation.
004	#3 Finish Coating Operations	Wood parts produced at Plants # 1 and #3 are coated in spray booths using air, airless, air assisted or HVLP spray where possible. Also includes print coating, dip coating and hand staining. Finished product is dried in steam-heated ovens in the Finishing Room.
005	#3 Wood-waste Boiler	Wood-burning boiler fed by wood chips and sawdust. Boiler provides steam for drying ovens in the finish coating operations and for space heating.
006	# 3 Wood Working Area	Dust collection unit (Bag filters A, B, C and D). Chip Cyclone separates wood chips from the wood hog chipping operation.

The above emissions units shall comply with all applicable provisions of the 40 CFR 63, National Emission Standards for Hazardous Air Pollutants, Subpart JJ, for Wood Furniture Manufacturing Operations [Rule 62-204.800, F.A.C.]

EMISSION LIMITATIONS

4. Visible emissions from the Bag Filters shall not exceed 5% opacity in lieu of particulate sampling. [Rule 62-297.620(4), F.A.C.]
5. Visible Emissions from the Wood Fired Boilers shall not exceed 20% opacity. [Rule 62-296.310, F.A.C.]

VOLATILE ORGANIC COMPOUNDS (VOC)

6. To avoid applicability of Rule 62-212.400, F.A.C., total volatile organic compounds (VOC) and organic solvents emissions, including 71.81 tons per year of volatile hazardous air pollutants (VHAP), from the entire facility shall not exceed 2.24 tons per day and 371.55 tons VOC/VHAP per year. [Rule 62-210.200, F.A.C.]
7. Volatile Hazardous Air Pollutants (VHAP) shall be controlled by using coatings that contain no more than the specified lb of VHAP/ lb solids (as applied) indicated below:
 - a. Finishing Operations

For all coatings (stains, washcoats, sealers, topcoat, basecoats, enamels and thinners) the weighted maximum average VHAP content shall not exceed 1.0 lb VHAP/lb solids, as applied [Rule 62-204.800(10)20., F.A.C.; 40 CFR 63]:

FINISH COATING OPERATIONS

Coating Type	Number of Coatings	Max. VHAP Content (lb VHAP/lb Solids)
Stains	23	1.0
Washcoats	10	1.0
Sealers	1	1.0
Topcoats	4	1.0
Basecoats	35	1.0
Enamels	0	1.0
Thinners	7	- ^a

^a Thinners have zero solids, therefore the lb VHAP/lb solids number is meaningless.

- b. Strippable Spray Booth Cleaning Operations

For all strippable spray booth materials, the VOC content shall not exceed 0.8 lb/lb solids, as applied. [Rule 62-204.800(10)20., F.A.C.; 40 CFR 63.802]

- c. Contact Adhesives

1. For foam adhesives used in products that meet flammability requirements, the VHAP content shall not exceed 1.8 lb/lb solids, as applied. [Rule 62-204.800(10)20., F.A.C.; 40 CFR 63.802]
 2. For all other contact adhesives, the VHAP content shall not exceed 1.0 lb/lb solids, as applied. [Rule 62-204.800(10)20., F.A.C.; 40 CFR 63.802]

OPERATIONAL LIMITATIONS

8. Emission Unit 004 shall be allowed to operate 2,450 hours/year. All other emission units shall be allowed to operate 8,760 hours per year. [Rule 62-210.200, F.A.C.]

WORK PRACTICE STANDARDS

9. The permittee shall, at a minimum, apply the following procedures to minimize emissions of VOC/VHAP emissions: [Rule 62-296.320(1)(a), F.A.C.]

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- Maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.
- Prevent excessive air turbulence across exposed VOC.
- Where possible and practical, procure/fabricate a tightly fitting cover for any open trough basin, bath, etc., of VOC so that it can be covered when not in use.
- Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
- Confine rags used with VOCs to tightly closed, fire-proof containers when not in use.
- Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

TEST METHODS AND COMPLIANCE PROCEDURES

10. Compliance with the allowable emission limiting standards stated in Section III, Emission Units Specific Conditions, shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A and 40 CFR 63, Appendix A, adopted by reference in Chapter 62-204, F.A.C.:

Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources.
Method 24	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface coatings.
Method 311	Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection Into a Gas Chromatograph.

11. The permittee shall demonstrate that each coating (whether purchased pre-made or formulated onsite) used at this facility shall not exceed the lb (VOC/VHAP)/lb solids (as applied) stated in Section III, Specific Condition No. 7, by maintaining certified product data sheets for each coating and thinner. [Rule 62-210.700, F.A.C.]
12. EPA Method 311 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data.

RECORDKEEPING AND REPORTING REQUIREMENTS

13. The permittee shall maintain records of the following:
- Certified product data sheet for each finishing material, thinner, contact adhesive.
 - The VOC/VHAP content in lb (VOC/VHAP)/lb solids, as applied, of each material used.
 - The material utilization rates on a daily basis, for all materials containing or emitting VOC/VHAP used.
 - The total and individual daily VOC/VHAP material utilization rates and the VOC/VHAP content of each material.
 - A total and individual rolling consecutive 365-day total VOC/VHAP emission rate calculated from the daily totals for the previous 365 day period.
 - Quantity of hazardous waste disposed off site on a quarterly basis.
 - Quantity of cleanup solvents used and the waste solvents hauled off site on a quarterly basis.
14. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These data shall be

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made available to the Department's permitting authority upon request. The Permitting Authority shall be notified in writing at least 15 days prior to the testing (auditing) of any instrument required to be operated by these specific conditions in order to allow witnessing by authorized personnel. [Rule 62-4.070(3), F.A.C.]

OTHER RULE REQUIREMENTS

15. This permit is issued in accordance with Rule 62.212.300, F.A.C., General Preconstruction Review. This facility is presently exempt from PSD review because of restrictions on VOC emissions and hours of operation. Any relaxation in these limits that increases the facility's potential to emit by at least 1 ton of VOC per year will require a full PSD review of the facility as though construction had not yet commenced on the facility [Rule 62-212.400(2)(g)].

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology ()
 - b) Determination of Prevention of Significant Deterioration (); and
 - c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Howard Rhodes
THRU: Clair Fancy/Al Linero *CLF*
FROM: John Reynolds *JR*
DATE: July 2, 2001
SUBJECT: Florida Furniture Industries, Inc. (FFI)
Consolidation of Palatka Furniture Plants Nos. 1 and 3
DEP File No. 1070026-003-AC

BAR

Attached is the final permit for consolidation of FFI's coating operations currently performed at two separate locations about 2.7 miles apart in Palatka. The reasons for the consolidation are lower operating costs and improved efficiency. By relocating existing coating equipment from one plant to the other (from Plant 1 to Plant 3), the total emissions for the two plants will remain at current levels and no new or additional equipment will have to be installed. Classifying the two plants as a single facility avoids PSD and is entirely consistent with EPA's guidance memo dated May 21, 1998 as well as Department rules since their processes are interconnected and the plants are commonly owned and operated. We applied essentially the same rationale for classifying two manufacturing sites as a single facility recently in the case of Sea Ray Boats.

FFI's facility (Plant 1 and Plant 3) is classified as a major emitting facility for volatile organic compounds (VOC) and volatile hazardous air pollutants (VHAPs). Plant 1 dates back to the early 1930s and never obtained a construction permit. Plant 1 was permitted separately under Title V (1070002-002-AV) imposing MACT coating content limits (1.0 lb VHAP and 0.8 lb VOC/lb solids) without a cap on total emissions or materials usage. The construction permit issued in 1997 for Plant 3 (1070026-001-AC) classified it as a synthetic minor facility (less than 250 tons VOC per year to avoid triggering PSD review pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration). A separate Title V permit (1070026-002-AV) applied MACT standards for Plant 3. As a result of consolidating the coating operations for Plants 1 and 3, they will be repermited under Title V as a single facility with a total emissions cap equal to the current 2-year average actual emissions for Plants 1 and 3.

No public comments were received during the comment period. I recommend your approval of the attached final permit.

Attachments

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William A. Cratch
Florida Furniture Industries, Inc.
PO Box 610
Palatka, FL 32178

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Kendall Johnson

C. Signature

Kendall Johnson

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below

☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Copy from service label)

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PS Form 3811, July 1999

Domestic Return Receipt

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Mr. William A. Cratch

Street, Apt. No., or PO Box No

PO Box 610

City, State, ZIP+4

Palatka, FL 32178

PS Form 3800, February 2000

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