

Florida Furniture Industries, Inc.

**No. 3 Plant**

**Facility ID No.: 1070026**

Putnam County

Initial Title V Air Operation Permit

**FINAL Permit No.: 1070026-002-AV**

Permitting Authority:

State of Florida

Department of Environmental Protection

Northeast District Air Program

7825 Baymeadows Way, Suite B200

Jacksonville, Florida 32256-7590

Telephone: 904/448-4310

FAX: 904/448-4363

Initial Title V Air Operation Permit  
FINAL Permit No.: 1070026-002-AV

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This permit is for the operation of the No. 3 Plant. This facility is located at 160 Comfort Road, Palatka, Putnam County; UTM Coordinates: Zone 17, 436.4 km East and 3283.4 km North; Latitude: 29° 40' 50" North and Longitude: 81° 39' 25" West.

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

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

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

**Effective Date:** July 22, 1998**Renewal Application Due Date:** January 22, 2003**Expiration Date:** July 22, 2003**[PERMITTING AUTHORITY]**

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**Christopher L. Kirts, P.E.****District Air Program Administrator**

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## **Section I. Facility Information.**

### **Subsection A. Facility Description.**

This facility consists of a Wood Waste Fired Boiler; Woodworking Area; & Finish Coating Operations which are used to manufacture wood furniture.

#### **E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
001	Wood Waste Fired Boiler
002	Woodworking Dust Collection
003	Finish Coating Operations

Based on the initial Title V permit application received 06-11-96, this facility is a major source of hazardous air pollutants (HAPs).

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**Subsection C. Relevant Documents.**

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

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

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

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

Appendix H-1, Permit History/ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received 06-11-96

Additional Information Request on 01-15-98

Additional Information Received on 02-05-98

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

## **Section II. Facility-wide Conditions.**

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

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [insert any required systems]  
[Rule 62-296.320(1)(a), F.A.C.; FINAL by applicant in the initial Title V permit application received [Month day, year]]
6. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.  
[Rule 62-213.440, F.A.C.]

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7. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District.

State of Florida

Department of Environmental Protection

Northeast District Air Program

7825 Baymeadows Way, Suite B200

Jacksonville, Florida 32256-7590

Telephone: 904/448-4310

FAX: 904/448-4363

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

United States Environmental Protection Agency

Region 4

Air, Pesticides &amp; Toxics Management Division

Operating Permits Section

61 Forsyth Street

Atlanta, Georgia 30303

Telephone: 404/562-9099

Fax: 404/562-9095

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

Subsection [A]. This section addresses the following emissions unit(s).

E.U.

ID No.    Brief Description

001	Wood Waste Fired Boiler with a multi-cyclone flyash arrestor system to control particulate matter emissions.
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The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The heat input shall not exceed 8.74 MMBTU/hr.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Methods of Operation - This boiler is fired with wood chips and sawdust.  
[Rule 62-213.410, F.A.C.]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.4. Visible Emissions shall not exceed 20% opacity except for 40% for 2 mins/hr.  
[Rule 62-296.410(2)(a), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A. 5. Visible Emissions testing shall comply with Rule 62-296.410(3), F.A.C. and shall be performed annually with a frequency base date of 03/15.



**Subsection [B]. This section addresses the following emissions unit(s).**

**E.U.**

**ID No.      Brief Description**

002      Woodworking Dust Collection System collects dust from several units with the emissions being exhausted from bag filters A & B to the atmosphere. Bag filter C exhausts inside the building.

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

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

**B.1. Hours of Operation.** This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.2.** At point (A), Visible Emissions shall not exceed 5% opacity.

[Rule 62-297.620(4), F.A.C.]

**B.3.** At point (B), Visible Emissions shall not exceed 5% opacity.

[Rule 62-297.620(4), F.A.C.]

**Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.4.** At point (A), Visible Emissions testing shall comply with the applicable requirements of Rule 62-297.401(9), F.A.C. and shall be performed annually with a frequency base date of 03/15.

**B.5.** At point (B), Visible Emissions testing shall comply with the applicable requirements of Rule 62-297.401(9), F.A.C. and shall be performed annually with a frequency base date of 03/15.

**Subsection [C]. This section addresses the following emissions unit(s).**

**E.U.**

**ID No.      Brief Description**

003      Finish Coating Operations with VOC emissions from spray booths using air, airless, air assisted or HVLP spray; from print coating, dip coating and hand pad staining; and product drying in steam heated ovens.

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

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

**C.1. Permitted Capacity.** The rates in the table below shall not be exceeded on an annual average basis:

COATING	GALLONS/DAY <sup>a</sup>	GALLONS/MONTH	GALLONS/YEAR <sup>b</sup>
FINISHING			
Stains	47.1	1,001.7	12,020
Washcoats	49.4	1,050.4	12,605
Sealers	109.0	2,316.6	27,799
Topcoats	108.8	2,311.9	27,743
Basecoats	15.8	336.8	4,041
Enamels	0	0	0
Thinners	62.9	1,336.4	16,037
Spray Booth			
Booth Coater	0.49	10.5	126

<sup>a</sup>-Based on 255 working days per year.

<sup>b</sup>-Based on 2,450 hours per year of operation

[Permit 1070026-001-AC]

**C.2. Hours of Operation.** This emissions unit is allowed to operate 2450 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Permit 1070026-001-AC]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**C.3.** 40 CFR 63.802, Table 3 emissions limitations as shown below shall be met by using coatings that contain no more than the specified lb of VHAP/ lb solids (as applied):

**a. Finishing Operation**

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.

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	---

<sup>1</sup>Thinners have zero solids, therefore the lb VHAP/lb solids number is meaningless.

**b. Strippable Spray Booth**

For all strippable spray booth coatings, the VOC content of the coatings shall not exceed 0.8 lb VOC/lb of solids, as applied.

[Rule 62-204.800(10)20.,F.A.C.; 40 CFR 63.802]

**WORK PRACTICES STANDARDS**

- C.4.**
1. The permittee shall, at a minimum, apply the following procedures to minimize emissions of VOC or organic solvents emissions:
  2. Maintain tightly fitting covers, lids, etc., on all containers of VOC when they are not being handled, tapped, etc.
  3. Prevent excessive air turbulence across exposed VOC.
  4. 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
  5. Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition
  6. Confine rags used with VOCs to tightly closed, fire-proof containers when not in use
  7. Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

Procedures already in place, including employee training to cover all containers when not in use; immediate spill clean up; minimization of overspray; and reporting all observed leaks, shall be continued in addition to the implementation by November 21, 1997 of the work procedures standards outlined in 40 CFR 63.803 Work Practice Standards.

[Rule 62-296.320(1)(a), F.A.C.; Permit 1070026-001-AC]

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- C.5.** The 40 CFR 63.803 Work Practice Standards shall be met and the Work Practice Plan dated 01-15-98 shall be utilized.

**Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

- C.6.** Compliance with the allowable emission limiting standards shall be determined by complying with the applicable requirements of 40 CFR 63.804(a) & 63.805.

**RECORDKEEPING AND REPORTING REQUIREMENTS**

- C.7.** Compliance with the recordkeeping and reporting requirements shall be met by complying with the applicable requirements of 40 CFR 63.806 & 63.807.
- C.8.** 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 made available to the Department's permitting authority upon request.  
[Rule 62-4.070(3), F.A.C.; 1070026-001-AC]

### Table 1-1, Summary of Air Pollutant Standards and Terms

Florida Furniture Industries, Inc.  
No. 3 Plant

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**Facility ID No.: 1070026**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
3	Finish Coating Operations

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
VHAP (Volatile Hazardous		2450	1.0 lb VHAP/lb solids					40 CFR 63.802	III.C.3.

Notes:

\* The "Equivalent Emissions" listed are for informational purposes only.

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## Table 2-1, Summary of Compliance Requirements

Florida Furniture Industries, Inc.  
No. 3 Plant

FINAL Permit No.: 1070026-002-AV  
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This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**   **Brief Description**  
3   Finish Coating Operations

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
VHAP (Volatile Hazardous		Record/Report		1-Mar			III.C.7.,8.

**Notes:**

\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

\*\*CMS [=] continuous monitoring system

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## Appendix H-1, Permit History/ID Number Changes

Florida Furniture Industries, Inc.  
No. 3 Plant

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### Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> <sup>1,2</sup>	<u>Revised Date(s)</u>
001	Wood Waste Fired Boiler	AO54-195322	06-12-91	06-20-96		
001	Wood Waste Fired Boiler	1070026-001-AC	08-07-97	03-31-98		

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### (if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 31JAX540026

To: Facility ID No.: 1070026

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#### Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}