

Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

June 4, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William A. Cratch  
Vice President/Operations  
Florida Furniture Industries  
Post Office Box 610  
Palatka, Florida 32178

Re: DRAFT Permit No. 1070026-003-AC  
Palatka, Florida


Dear Mr. Cratch:

Enclosed is one copy of the Draft Air Construction Permit for consolidation of Plant No. 1 and Plant No. 3 as a single wood manufacturing facility in Palatka, Putnam County. The Technical Evaluation and Preliminary Determination, the Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE" must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section, at the above letterhead address. If you have any questions, please contact J. M. Reynolds at 850/921-9530.

Sincerely,

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

CHF/jr

Enclosures

In the Matter of an  
Application for Permit by:

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

DRAFT Permit No.: 1070026-003-AC  
Wood Furniture Manufacturing Facility  
Plant Consolidation  
Putnam County

### **INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the existing plants, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Florida Furniture Industries, Inc. applied on March 20, 2001, to the Department for an air construction permit for consolidation of Plant No. 1 and Plant No. 3 as a single wood furniture manufacturing facility with separate locations. Plant No. 1 is located at 722 River Street and Plant No. 3 is located at 160 Comfort Road in Palatka, Putnam County. The coating operations for both facilities will be consolidated at Plant No. 3.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required for this action. The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114 / Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must

contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

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

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section

120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

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 INTENT TO ISSUE AIR CONSTRUCTION PERMIT (including the Public Notice, Technical Evaluation and Preliminary Determination, and the DRAFT permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 6/4/01 to the person(s) listed:

William A. Cratch - Florida Furniture Industries, Inc. \*  
Tim Norman, P.E.  
Gregg Worley, EPA  
Chris Kirts, DEP NED  
Pat Reynolds, DEP NED 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.

Charlatti Hayes 6/4/01  
(Clerk) (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit No.: 1070026-003-AC  
Florida Furniture Industries, Inc.  
Wood Furniture Manufacturing Facility  
Consolidation of Plant No. 1 and Plant No. 3  
Palatka, Putnam County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Florida Furniture Industries (FFI), Inc., for consolidation of 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. A Best Available Control Technology (BACT) determination was not required. The applicant's name and address are: Florida Furniture Industries, Inc., Post Office Box 610, Palatka, Florida 32178.

Florida Furniture Industries (FFI) owns and operates two wood furniture manufacturing plants located approximately 2.75 miles apart in Palatka, Putnam County. Plant 1 is located at 722 River Street; Plant 3 is located at 160 Comfort Road in Palatka. UTM coordinates for Plant 1: Zone 17, 438.3 km east and 3278.9 km North; and for Plant 2: Zone 17, 436.4 km East and 3283.4 km North. This air construction permit will consolidate FFI's operations in a single facility by relocating all coating operations from Plant No. 1 to Plant No. 3. The aggregated facility will have no increase in total emissions over current emission levels.

Emissions sources include wood working areas, finish coating operations, 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.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed DRAFT Permit issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. before the deadline for filing a petition. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at

**NOTICE TO BE PUBLISHED  
IN THE NEWSPAPER**

the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

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

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection	Dept. of Environmental Protection	Dept. of Environmental Protection
Bureau of Air Regulation	Northeast District Office	Northeast District Branch Office
111 S. Magnolia Drive, Suite 4	7825 Baymeadows Way, Suite 200B	101 NW 75 Street, Suite 3
Tallahassee, Florida, 32301	Jacksonville, Florida 32256-7590	Gainesville, FL 32607
Telephone: 850/488-0114	Telephone: 904/448-4300	Telephone: 352/333-2850
Fax: 850/922-6979	Fax: 904/448-4363	Fax: 352/333-2856

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

**NOTICE TO BE PUBLISHED  
IN THE NEWSPAPER**

**TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION**

**FLORIDA FURNITURE INDUSTRIES, INC.  
Palatka, Putnam County**

**Consolidation of Wood Furniture Finish Coating Operations  
For Plants Nos. 1 and 3**

Air Construction Permit No. 1070026-003-AC

**DIVISION OF AIR RESOURCES MANAGEMENT  
BUREAU OF AIR REGULATION  
NEW SOURCE REVIEW SECTION**

June 4, 2001

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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## 1. APPLICATION INFORMATION

### *Applicant, Responsible Official*

William A. Cratch  
Vice President/Operations  
Florida Furniture Industries, Inc.  
Post Office Box 610  
Palatka, Florida 32178

### *Reviewing and Process Schedule*

03-20-01: Receipt of Application  
03-20-01: Application Determined Complete  
06-04-01: Intent to Issue

## 2. FACILITY INFORMATION

### *Facility Location*

Florida Furniture Industries (FFI) owns and operates two wood furniture manufacturing plants located approximately 2.75 miles apart in Palatka, Putnam County. Plant 1 is located at 722 River Street; Plant 3 is located at 160 Comfort Road in Palatka. UTM coordinates for Plant 1: Zone 17, 438.3 km east and 3278.9 km North; and for Plant 2: Zone 17, 436.4 km East and 3283.4 km North.

### *Standard Industrial Classification Code (SIC)*

Major Group No.	25	Furniture and Fixtures
Group No.	251	Household Furniture
Industry No.	2511	Wood Household Furniture, except upholstered

### *Facility Category*

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). 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). Total VOC emissions for Plant 3 included approximately 121 tons of VHAPs per year. 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. As a result of consolidating the

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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.

### 3. PROJECT DESCRIPTION

This permit consolidates the following emissions units in a single facility:

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.
#1 004	Plant #3 Finish Coating Operations (stains, washcoats, sealers, topcoats, basecoats, enamels, thinners).	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.
#2 005	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.
#3 006	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.

### 4. PROCESS DESCRIPTION/EMISSIONS

Florida Furniture Industries, Inc., manufactures wood bedroom furniture. The manufacturing process includes the following steps:

- Wet lumber containing about 25 percent moisture is fed to the dry kilns and dried to 8 percent moisture. Heat for drying is supplied by steam from the wood waste boilers. The drying kilns operate 24 hours per day year-round.
- Processed wood furniture parts are coated in spray booths using air, airless, air assisted, or HVLP Spray when possible. In addition to spray coating, print coating, dip coating and hand pad staining is also used. Finished product is dried in steam-heated ovens in the Finishing Room. Emissions control for the spray booths consists of polyester-paper filters.
- Wood dust from the woodworking operations is pneumatically conveyed to the wood dust storage house via a closed loop system. Air is cleaned by bag filters prior to being discharged to the atmosphere. Collected wood dust is utilized to fire the steam boiler. The only emissions from the Bag Filters are PM/PM<sub>10</sub>.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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- d. Wood-fired boilers provide steam to the plants for heating of the drying ovens used in finish coating operations (Plant 3), the three dry kilns (Plant 1), and for heating of the manufacturing areas. The boilers are fired by wood chips and sawdust using a multi-cyclone fly ash arrestor and a fly ash re-injection system. The boilers have the potential to emit carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and particulate (PM).

Emissions from the process consist of particulate matter (PM), carbon monoxide (CO), hazardous air pollutants (HAPs), volatile hazardous air pollutants (VHAPs) and volatile organic compounds (VOCs). The largest portion of the HAPs, VOC and VHAPs emissions result from xylenes, vinyl acetate, toluene, naphthalene, methyl isobutyl ketone, methylethyl ketone, methanol, glycol ethers, formaldehyde, ethyl benzene, dibutylphthalate, cumene, manganese, chromium and cobalt compounds.

The following table summarizes the new VOC and VHAP allowable emissions for the aggregated facility. The allowables in tons per year are equal to the 2-year average emissions for Plants 1 and 3 combined for 1999-2000:

Non-HAP VOC	299.74	
Ethyl Benzene (H085)		9.04
Glycol Ethers (H096)		5.34
Methanol (H115)		0.70
Methyl Ethyl Ketone (H120)		0.70
Toluene (H169)		17.04
Xylene (H186)		38.99
Total VHAP	71.81	
Total VOC/VHAP	371.55	

### 5. RULE APPLICABILITY

Past permitting actions for the two FFI plants are summarized below to help clarify rule applicability for consolidating them in this permitting action.

#### Plant No. 1

- FFI began operation in the early 1930s with two dry kilns and a boiler. The two kilns were replaced in 1985 after being destroyed by fire. A third kiln was added in 1993.
- FFI submitted an application for an after-the-fact construction permit in June 1996.
- Department's response asked if any PSD-significant modifications had occurred.
- FFI answered that although Plant No. 1's VOC emissions were above 250 TPY when the PSD rules took effect in 1977, no modifications were made since then that would have increased potential to emit.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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- Department asked how much, if any, the 1985 kiln replacement and the 1993 kiln addition had increased VOC emissions.
- Following a meeting with Department staff in Tallahassee on November 7, 1996, FFI withdrew its after-the-fact construction permit application for Plant No. 1 on the ground that no changes to the finish coating operations had occurred since 1974 and that the facility will be covered by a Title V operation permit. FFI also stated that incorrect assumptions were made in its application regarding estimated potential emissions and that VOC emissions are actually below the 250 TPY major facility threshold.
- In January 1997, the Department confirmed that no PSD or after-the-fact permit is required for Plant No. 1.

### Plant No. 3

- Woodworking/finish coating operations commenced in 1985 with wood waste being fed to a boiler. No process modifications have occurred except that a third bag filter was added to the process in 1992.
- FFI submitted an application for an after-the-fact construction permit on June 10, 1996.
- On October 1, 1996, the Department determined that a PSD permit application must be submitted for Plant No. 3.
- On December 2, 1996, the Department received a revised permit application explaining that discrepancies and raw material accounting errors were responsible for the high emission estimates made earlier and that actual VOC emissions are less than 250 TPY.
- Additional information requested by the Department was submitted on March 19, 1997, substantiating the claim of non-PSD applicability for VOC emissions.
- On August 8, 1997, the Department issued to FFI a non-PSD after-the-fact construction permit for Plant No. 3 as a synthetic minor facility. The permit contained a provision triggering retroactive PSD review if any future change results in a VOC emissions increase of one (1.0) TPY.
- On March 20, 2001, FFI submitted an application to consolidate the finish coating operations for Plants 1 and 3 so that all finish coating will be done at Plant 3 with no increase in the total VOC emissions for the two plants.

Plant 1 is located in a populated area near downtown Palatka. The relocation of Plant 1's VOC/HAP emissions to Plant 3, located in a sparsely populated area 2.75 miles to the north, is allowable on the basis of applicable rules and the modeling that was done for the 1997 permitting action cited above (see "Ambient Impact Analysis").

The issue of whether consolidation of coating operations triggers PSD review for Plant 3 due to a significant increase rests on whether the emissions changes are offsetting. According to EPA's emissions netting policy, the consideration of contemporaneous emission changes is source-specific, that is, the netting must take place at the same emissions source (under Florida's rules, the term "source" is equivalent to "facility"). The Department's definition of a

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single facility is: "All of the emissions units which are located on one or more contiguous *or adjacent* properties and which are under the control of the same person (or persons under common control)." The term "adjacent" is not defined, thus it is left for a case-by-case determination.

The Department's basis for formerly classifying these two plants as separate facilities was their separate locations. Information recently submitted by the applicant shows that the two plants will interact as a single facility since the coating operations for wood products manufactured at both locations will be conducted at Plant 3. In a letter dated February 12, 2001, the applicant states the following: "This proposed change would not involve the construction of new facilities at Plant No. 3, merely an increase in the number of personnel and/or hours of operation. ... The dry kilns, boiler, and some woodworking operations would continue at Plant No. 1. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc."

In the Department's 1999 PSD applicability decision on Sea Ray Boats, Inc. (PSD-FL-274), a similar decision was made to consider two manufacturing sites located a mile apart as a single facility on the basis of common administrative control and the fact that facilities do not have to be contiguous to be "adjacent." The rule applicability analysis stated,

*"Although the Cape Canaveral Plant is not contiguous to properties on which the other Merritt Island plants are located (it is 1.2 miles east of the Sykes Creek Plant) the Department considers it to be "adjacent" to the Merritt Island facility for the following reasons: The word "adjacent" is defined as: "Adjacent" – ad. 1. Close to; Lying near. 2. Next to; adjoining. [ME < Lat. Adjacens, pr. Part. Of adjacere, to lie near : Ad-, near to + jacere, to lie.] – adjacently – adv. Since the second connotation "next to; adjoining" is already covered by the term "contiguous," the connotation of adjacent in the facility definition is "close to; lying near." "Near" simply means to be within a short distance of interval in space or time. These are relative terms, but are encountered every day and readily interpreted based on context."*

In another case, the EPA issued a May 21, 1998 guidance memo (see EPA's web site) to the State of Utah "for the purpose of determining if two utility trailer facilities should or should not be aggregated into a single source under the Clean Air Act Title V and New Source Review permitting programs". There, the EPA stated that the distance associated with "adjacent" must be considered on a case-by-case basis. Referring to the preamble to the August 7, 1980 PSD rules, "EPA is unable to say precisely at this point how far apart activities must be in order to be treated separately. The Agency can answer that question only through case-by-case determinations." The memo goes on to say that EPA has never attempted to indicate a specific distance for "adjacent", and that a determination of

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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“adjacent” should include an evaluation of whether the distance between two facilities is sufficiently small that it enables them to operate as a single “source” (facility).

The memo poses several questions to be considered in the case-by-case determination:

1. Would the dependence of one facility upon the other be significantly affected if the two were sited much further apart?
2. Will materials be routinely transferred between the facilities?
3. Will managers or other workers frequently shuttle back and forth to be involved actively in both facilities?
4. Will the production process itself be split in any way between the facilities, i.e., will one facility produce an intermediate product that requires further processing at the other facility, with associated air pollutant emissions? For example, will components be assembled at one facility but painted at the other?

The EPA memo states that not all of the above questions need to be answered “yes” for two facilities to be considered adjacent (for FFI, all of the above questions can be answered in the affirmative).

Also presented is an illustration of this type of evaluation whereby two mining facilities located 21.5 miles apart were considered “adjacent” on the basis of the functional inter-relationships between them. The lengthy distance between the two sites was not an overriding factor preventing them from being considered as a single source.

Another example of a single facility in the EPA memo is that of two separately-located metal casting foundries where castings produced at both locations are coated, packaged and shipped at one of the plants (the analogous situation will exist for FFI since all coating operations for Plants 1 and 3 will be consolidated at Plant 3). The EPA’s “guiding principle” for a determination as a “single stationary source” focused on the pollutant emitting activities involved in production of the final product. The emission-generating activities associated with a making a particular product were viewed as occurring within a single source even though they were carried out at separate sites.

Thus, the Department will issue an air construction permit for FFI’s Plants 1 and 3 as a single facility with the requirement that aggregated emissions are limited to currently permitted levels and any future increase over the aggregated limits will trigger retroactive PSD review. This condition triggering retroactive PSD applicability upon an increase in potential emissions of 1 ton per year is a condition of the construction permit for Plant No. 3 (1070026-001-AC) and will be included in the consolidated permit. Therefore, the proposed consolidation, with aggregated emission limits, is not subject to preconstruction review requirements under provisions of Chapter 62-212 of the Florida Administrative Code but is subject to Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.), and all applicable provisions of the Code of Federal Regulations, 40 CFR 63, National Emission Standards

## **TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

for Hazardous Air Pollutants (NESHAP), Subpart JJ - Wood Furniture Manufacturing Operations, as adopted in Chapter 62-204, F.A.C.

### **AMBIENT IMPACT ANALYSIS**

VOC/HAP dispersion modeling using EPA-approved SCREEN3 and Industrial Source Complex Short-Term (ISCST3) was done in 1997 (1070026-001-AC). Since the total annual material usage modeled in 1997 for Plant 3 exceeds the total 1998-2000 Plant 3 average annual usage by at least a factor of two, it is reasonable to conclude that doubling the coatings currently being applied at Plant 3 will have a lesser impact for Plant 3 without requiring further modeling. Also, since Plant 3 is in a more sparsely populated area north of the downtown area, it is unlikely that the consolidation would cause any noticeable impact in the vicinity of Plant 3. Furthermore, the relocation of coating operations from Plant No. 1 to Plant No. 3 will improve air quality in the more densely populated areas around Plant 1.

### **7. CONCLUSION**

Based on the foregoing technical evaluation of the application and other information provided by Florida Furniture Industries (FFI), the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations.

### **Department Contact For Additional Information**

John Reynolds, Permit Engineer  
New Source Review Section  
Bureau of Air Regulation, MS 5505  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Phone: 850-921-9530  
Fax: 850-922-6979



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

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

# DRAFT

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

## 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

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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 xx-xx-2001
- Final Permit Issued xx-xx-2001

Florida Furniture Industries, Inc.  
Consolidation  
Palatka, Florida  
003-AC

Wood Furniture Plant

Permit No. 1070026-

## AIR CONSTRUCTION PERMIT 1070026-003-AC

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### 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 Blainstone 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 75<sup>th</sup> 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. Completion of Construction: The permit expiration date <sup>of</sup> is December 31, 2002. <sup>1/ will allow</sup> Physical construction shall ~~be complete by September 30, 2002.~~ The additional time ~~provides~~ for testing, submittal of results, and submittal of the Title V permit to the Department.
9. Permit Expiration Date Extension: The permittee, for good cause, may request that this ~~PSD~~ 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.]

## AIR CONSTRUCTION PERMIT 1070026-003-AC

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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

## AIR CONSTRUCTION PERMIT 1070026-003-AC

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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.]

## AIR CONSTRUCTION PERMIT 1070026-001-AC

## 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	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.

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.]

**AIR CONSTRUCTION PERMIT 1070026-001-AC**

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	- <sup>a</sup>

<sup>a</sup> 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.]

## AIR CONSTRUCTION PERMIT 1070026-001-AC

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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.

## AIR CONSTRUCTION PERMIT 1070026-001-AC

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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 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]**

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- 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]**

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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.