



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 14, 2001

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Howard L. Gardner, President  
Florida Furniture Industries, inc.  
Post Office Box 610  
Palatka, Florida 32178

Putnam County - Air Permitting  
Florida Furniture Industries, Inc.  
Project No: 004: Initial Title V Permit after Consolidation of Plant Nos. 1 & 3  
Request for Additional Information Regarding Title V Permit Application

RECEIVED  
NOV 21 2001  
BUREAU OF AIR REGULATION

Dear Mr. Gardner:

On September 20, 2001, the Department received your application for the Initial Title V Permit for the referenced facility.

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)4., F.A.C., and Rule 62-4.070(1), F.A.C. Should your response to any of the following items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. In section II, Facility Information, 40 CFR Part 63 did not appear in the "List of Applicable Regulations". However, this facility is subject to the requirements of 40 CFR 63, National Emission Standards for Hazardous Air Pollutants, Subpart JJ, Wood Furniture Manufacturing Operations. Please revise this list of Applicable Regulations as necessary.
2. In section II, Facility Information, Subpart B. Facility Pollutants, the requested Emissions Cap for VOC is stated as 374.49 tons per year. The reason is stated as being OTHER. However Specific Condition No. 6 of air construction Permit No. 1070026-003-AC states that in order to avoid applicability of Rule 62-212.400, F.A.C., the total VOC emissions (including 71.81 TPY of VHAPs) shall not exceed **2.24 tons per day and 371.55 tons per year**. Furthermore, Specific Condition Number 15 states that any relaxation that increases the facility's potential to emit by at least 1 ton of VOC per year will require a full PSD review.

Please revise this section of the application as needed. It appears that the ESCPSD code would be more appropriate in this instance.

3. Please provide evidence of compliance with Section III Specific Conditions 7, 11, 12, and 13 of air construction Permit No. 1070026-003-AC.
4. Please provide evidence of compliance with the work practice standards of 40 CFR 63.803.

"More Protection, Less Process"

--ATTENTION MAIL ROOM--

PLEASE ROUTE THIS  
DOCUMENT TO:

John Reynolds - DARM  
Name of Individual/Office

5500  
Mail Station Number

Mr. Howard L. Gardner, President  
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5. Specific Condition No. 5 of air construction permit No. 1070026-003-AC states that the visible emissions from the Wood Boilers shall not exceed 20% Opacity. Rule 62-296.310 is cited as the basis of the condition. Because these boilers are carbonaceous boilers they are subject to the requirements of Rule 62-296.410(2)(a), which allows for a 40% opacity exception to the 20% opacity limit for 2 minutes per hour.

It appears that Florida Furniture Industries, Inc. has accepted a slightly more stringent visible emissions standard for the Wood Boilers. In accordance with Rule 62-210.300(1)(b), the limitations and requirements of an air construction permit shall be included and identified in the operation permit. However limitations and requirements can be changed so long as those changes that would constitute a modification are changed through the issuance of a construction permit. Therefore, please submit an application for a modification to the construction permit in order to correct the visible emissions limitations applied to the Wood Boilers.

Responsible Official (R.O.) Certification Statement:

Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, the responsible official should certify your response. Please complete and submit a new R.O. certification statement page from the Application for Air Permit - Title V Source, DEP Form No. 62-210.900(1), effective February 11, 1999 (enclosed).

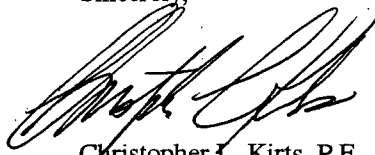
Professional Engineer (P.E.) Certification Statement:

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, a professional engineer registered in the State of Florida should certify your response. Please complete and submit a new P.E. certification statement page from the Application for Air Permit - Title V Source, DEP Form No. 62-210.900(1), effective February 11, 1999 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please call Rita Felton-Smith at (904) 807-3300, extension 3237.

Sincerely,



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

CLK:RFS

Enclosure:      (x) Responsible Official Certification Statement  
                      (x) Professional Engineer Certification Statement

Copy to:

Timothy P. Norman, P.E.  
John Reynolds, DARM