

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. Timothy P. Norman, P.E.
Manager of Environmental Services
Mittauer & Associates, Inc.
4611-4 U.S. Highway 17
Orange Park, FL 32003

2. Article Number (Copy from service label)
7099 3400 0000 1453 1576

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

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

Beth Brown

7/20/01

C. Signature

x Beth Brown

☐ Agent
☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)

Mr. Timothy P. Norman, P.E.

Street, Apt. No., or PO Box No.

4611-4 U.S. Highway 17

City, State, ZIP+4

Orange Park, FL 32003

PS Form 3800, July 1999

See Reverse for Instructions

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

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**DRAFT Permit No. :
01070026-003-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.

STATE OF FLORIDA §
§
County of Putnam §

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

Legal Number: 75,019

PUBLIC NOTICE PUBLIC NOTICE OF INTENT T

was published in said newspaper 1 time with said publication being made on the following dates:

06/11/01

The Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice, and/or advertisement.

Tracy Collins

Sworn to and subscribed before me this June 11, 2001 by

Tracy Collins Classified Phone Sales Coordinator of the Daily News,
a Florida corporation, on behalf of the corporation.

Mary Kaye Wells

Mary Kaye Wells, Notary Public,
State of Florida



Notary

Seal of Office:

- ☒ Personally known to me, or
☐ Produced identification:
☒ Did take an

6/7/01

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 the 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 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 part 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
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6975

Dept. of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 220B
Jacksonville, Florida 32256-7590
Telephone: 904/448-4300
Fax: 904/448-4363

Dept. of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, Florida 32607
Telephone: 352/333-2850
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.
Legal No. 75019 6/11/01

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>A. Received by (Please Print Clearly) Kendall Johnson</p> <p>C. Signature <i>Kendall Johnson</i></p> </div> <div style="width: 35%;"> <p>B. Date of Delivery</p> </div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>D. Is delivery address different from item 1? If YES, enter delivery address below</p> </div> <div style="width: 35%;"> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee <input type="checkbox"/> Yes <input type="checkbox"/> No</p> </div> </div> <p style="text-align: center; font-size: 2em; font-weight: bold; border: 2px solid black; border-radius: 50%; padding: 10px; margin: 10px auto; width: 150px;"> 11 2001 FL 32177 USPS </p>
<p>1. Article Addressed to:</p> <p>Mr. William A. Cratch Florida Furniture Industries, Inc. PO Box 610 Palatka, FL 32178</p>	<p>3. Service Type</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p><input type="checkbox"/> Certified Mail</p> <p><input type="checkbox"/> Registered</p> <p><input type="checkbox"/> Insured Mail</p> </div> <div style="width: 45%;"> <p><input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> C.O.D.</p> </div> </div>
<p>2. Article Number (Copy from service label) 7000 0600 0026 4129 8351</p>	
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service

CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Postmark
Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Mr. William A. Cratch

Street, Apt. No., or PO Box No.
PO Box 610

City, State, ZIP+4
Palatka, FL 32178

PS Form 3800, February 2000

See Reverse for Instructions

7000 0600 0026 4129 8351

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. William A. Cratch
Vice President/Operations
Florida Furniture Industries
P. O. Box 610
Palatka, FL 32178

2. Article Number (Copy from service label)

7000 0600 0026 4129 8658

COMPLETE THIS SECTION ON DELIVERY

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

Kendall Johnson

C. Signature

Kendall Johnson

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES enter delivery address below:

☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

Mr. William A. Cratch

Postage

\$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees

\$

Postmark
Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Florida Furniture Industries

Street, Apt. No., or PO Box No.

P. O. Box 610

City, State, ZIP+4

Palatka, FL 32178

PS Form 3800, February 2000

See Reverse for Instructions



4611-4 U.S. Highway 17
Orange Park, Florida 32003
Office: (904) 278-0030
Fax: (904) 278-0840

RECEIVED

JUL 17 2001

BUREAU OF AIR REGULATION

July 11, 2001

John M. Reynolds
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

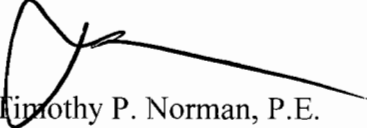
RE: Expiration of Permit No. 1070026-003-AC
Air Permitting
Florida Furniture Industries
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Reynolds:

Upon review of the Final Permit No. 1070026-003-AC for Florida Furniture, we noticed that the expiration date on Page 1 of the permit is still December 31, 2001 while on Page 3, Section II, Item 8 of the permit indicates a December 31, 2002 expiration date. This discrepancy was identified in our June 14, 2001 letter. Please change the expiration date on Page 1 of the permit to December 31, 2002.

We greatly appreciate all your help on this permit. Contact me if you have any questions.

Sincerely,
Mittauer & Associates, Inc.



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

TPN/bb

cc: Florida Furniture



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 17, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy P. Norman, P.E.
Manager of Environmental Services
Mittauer & Associates, Inc.
4611-4 U.S. Highway 17
Orange Park, Florida 32003

Re: Expiration Date of Permit 1070026-003-AC (Florida Furniture, Inc.)

Dear Mr. Norman:

This confirms your conversation today with our staff regarding the correct expiration date of the above referenced permit. As stated on the cover page of the permit, the expiration date is December 31, 2001. Our file copy shows that the draft typo on page three (2002) was corrected before the final was mailed. Since the permit is for consolidation of two sites as a single facility without requiring any construction, the expiration date of December 31, 2001 was deemed as sufficient.

If there are any questions regarding the above, please call John Reynolds at 850/921-9530.

Sincerely,

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

AAL/JR

cc: Chris Kirts, DEP Northeast District
William A. Cratch, Florida Furniture, Inc.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Received by (Please Print Clearly) Beth Brown	
1. Article Addressed to: Mr. Timothy P. Norman, P.E. Manager of Environmental Services Mittauer & Associates, Inc. 4611-4 U.S. Highway 17 Orange Park, FL 32003		B. Date of Delivery 7/20/01	
		C. Signature X Beth Brown <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Copy from service label) 7099 3400 0000 1453 1576			
PS Form 3811, July 1999		Domestic Return Receipt	
		102595-99-M-1789	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7099 3400 0000 1453 1576

Article Sent To:	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (to be completed by mailer) Mr. Timothy P. Norman, P.E.	
Street, Apt. No., or PO Box No. 4611-4 U.S. Highway 17	
City, State, ZIP+4 Orange Park, FL 32003	
PS Form 3800, July 1999 See Reverse for Instructions	



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 U.S. Highway 17
Orange Park, Florida 32003
Office: (904) 278-0030
Fax: (904) 278-0840

June 14, 2001

RECEIVED
JUN 18 2001
BUREAU OF AIR REGULATION

John M. Reynolds
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Submittal of Proof of Publication of Draft Permit No. 1070026-003-AC
Air Permitting
Florida Furniture Industries
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Reynolds:

Enclosed is the proof of publication of Draft Permit No. 1070026-003-AC for Florida Furniture. The only comment we have on the draft permit relates to a conflict in the expiration date of the permit. Page 1 of the permit indicates a December 31, 2001 expiration date while Page 3, Section II, Item 8 indicates a December 31, 2002 expiration date.

Contact me if you have any questions or require additional information.

Sincerely,
Mittauer & Associates, Inc.

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

TPN/bb
Enclosure

cc/enc: Florida Furniture

cc: J. Reynolds
C. Korte, NED

PUBLIC NOTICE
PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit No. :
01070026-003-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 the 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 the time of filing. The failure of any person to file a petition within the appropriate time period shall

STATE OF FLORIDA §
§
County of Putnam §

The undersigned personally appeared before me, a Notary Public for the State of Florida, and deposes that the Daily News is a daily newspaper of general circulation, printed in the English language and published in the City of Palatka in said County and State; and that the attached order, notice, publication and/or advertisement:

Legal Number: 75,019

PUBLIC NOTICE PUBLIC NOTICE OF INTENT

was published in said newspaper 1 time with said publication being made on the following dates:

06/11/01

The Daily News has been continuously published as a daily newspaper, and has been entered as second class matter at the post office at the City of Palatka, Putnam County, Florida, each for a period of more than one year next preceding the date of the first publication of the above described order, notice, and/or advertisement.

Tracy Collins

Sworn to and subscribed before me this June 11, 2001 by

Tracy Collins Classified Phone Sales Coordinator of the Daily News, a Florida corporation, on behalf of the corporation.

Mary Kaye Wells

Mary Kaye Wells, Notary Public,
State of Florida



Notary

Seal of Office:

- ☐ Personally known to me, or
☐ Produced identification:
☒ Did take an

6/7/01

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 part to it. Any subsequent intervention will be only a the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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Dept. of Environmental
Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 850/488-0114
fax: 850/922-0595

Dept. of Environmental
Protection
Northeast District Office
7825 Baymeadows Way, Suite
220B
Jacksonville, Florida 32256-
7590
Telephone: 904/448-4300
Fax: 904/448-4363

Dept. of Environmental
Protection
Northeast District Branch
Office
101 NW 75 Street, Suite 3
Gainesville, Florida 32607
Telephone: 352/333-2850
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.
Legal No. 75019 6/11/01

FINAL DETERMINATION

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

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

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit by:


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

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

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

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

Executed in Tallahassee, Florida.


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

CERTIFICATE OF SERVICE

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

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

Clerk Stamp

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


(Clerk) (Date)



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

PERMITTEE:

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

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

Authorized Representative:

Mr. William A. Cratch
Vice President/Operations

PROJECT AND LOCATION:

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

STATEMENT OF BASIS:

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

Attached appendices made a part of this permit:

Appendix GC Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 1070026-003-AC

SECTION I - FACILITY INFORMATION

FACILITY DESCRIPTION

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

EMISSIONS UNITS

This permit addresses the following emissions units:

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

REGULATORY CLASSIFICATION

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

PERMIT SCHEDULE/RELEVANT DOCUMENTS

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

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

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

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- determine the compliance of the emissions unit with applicable emission limiting standards. [Rule 62-297.310(5)(a), F.A.C.]
- b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5)(b), F.A.C.]
20. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
21. Stack Testing Facilities: Required stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C. [Rule 62-297.310]
22. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2)(b), F.A.C.]
23. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]
24. Emissions Performance Test Results Reports: A report indicating the results of any required emissions performance test shall be submitted to each Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
25. Annual Operating Reports: The permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the Department's Northeast District Office by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

SECTION III – EMISSIONS UNITS SPECIFIC CONDITIONS

APPLICABLE STANDARDS AND REGULATIONS

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

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

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

EMISSION LIMITATIONS

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

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VOLATILE ORGANIC COMPOUNDS (VOC)

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

- a. Finishing Operations

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

FINISH COATING OPERATIONS

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

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

- b. Strippable Spray Booth Cleaning Operations

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

- c. Contact Adhesives

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

OPERATIONAL LIMITATIONS

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

WORK PRACTICE STANDARDS

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

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

TEST METHODS AND COMPLIANCE PROCEDURES

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

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

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

RECORDKEEPING AND REPORTING REQUIREMENTS

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

AIR CONSTRUCTION PERMIT 1070026-001-AC

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

OTHER RULE REQUIREMENTS

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

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

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

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

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

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

Memorandum

Florida Department of Environmental Protection

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

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

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

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

Attachments

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

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

2. Article Number (Copy from service label)

7000 0600 0026 4129 8351

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Kendall Johnson

B. Date of Delivery

C. Signature

Kendall Johnson

☐ Agent☐ AddresseeD. Is delivery address different from item 1?
If YES, enter delivery address below☐ Yes☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

Postage

\$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees

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Recipient's Name (Please Print Clearly) (to be completed by mailer)

Mr. William A. Cratch

Street, Apt. No., or P.O. Box No.

PO Box 610

City, State, ZIP

Palatka, FL 32178

PS Form 3800, February 2000

See Reverse for Instructions



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

"More Protection, Less Process"

Printed on recycled paper.

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.

Charlatta J. 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
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590
Telephone: 904/448-4300
Fax: 904/448-4363

Dept. of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, FL 32607
Telephone: 352/333-2850
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

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.
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.
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.

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/PM₁₀.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- 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_x), 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

- 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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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

“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

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

SECTION II – ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to applications for permits to construct or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114.
2. Compliance Authority: All documents related to operation, reports, tests, and notifications should be submitted to the DEP Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590, phone 904/448-4300 and Northeast District Branch Office, 101 NW 75th Street, Suite 3, Gainesville, Florida, phone 352/333-2850.
3. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
4. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
5. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
6. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212, F.A.C.]
7. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. Completion of Construction: The permit expiration date is December 31, 2002. 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

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

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.]

5. Visible Emissions from the Wood Fired Boilers shall not exceed 20% opacity. [Rule 62-296.310, F.A.C.]

VOLATILE ORGANIC COMPOUNDS (VOC)

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

a. Finishing Operations

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

FINISH COATING OPERATIONS

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

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

b. Strippable Spray Booth Cleaning Operations

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

c. Contact Adhesives

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

OPERATIONAL LIMITATIONS

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

WORK PRACTICE STANDARDS

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

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

TEST METHODS AND COMPLIANCE PROCEDURES

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

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

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

RECORDKEEPING AND REPORTING REQUIREMENTS

13. The permittee shall maintain records of the following:
- Certified product data sheet for each finishing material, thinner, contact adhesive.
 - The VOC/VHAP content in lb (VOC/VHAP)/lb solids, as applied, of each material used.
 - The material utilization rates on a daily basis, for all materials containing or emitting VOC/VHAP used.
 - The total and individual daily VOC/VHAP material utilization rates and the VOC/VHAP content of each material.
 - A total and individual rolling consecutive 365-day total VOC/VHAP emission rate calculated from the daily totals for the previous 365 day period.
 - Quantity of hazardous waste disposed off site on a quarterly basis.
 - Quantity of cleanup solvents used and the waste solvents hauled off site on a quarterly basis.

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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

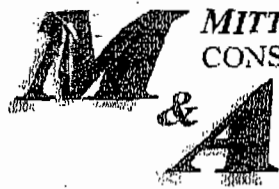
15. This permit is issued in accordance with Rule 62.212.300, F.A.C., General Preconstruction Review. This facility is presently exempt from PSD review because of restrictions on VOC emissions and hours of operation. Any relaxation in these limits that increases the facility's potential to emit by at 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]

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

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

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



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

Yuli
4611-4 U.S. Highway 17
Orange Park, Florida 32003
Office: (904) 278-0030
Fax: (904) 278-0840

February 12, 2001

VIA FAX: (850) 922-6979

A. A. Linero, P.E., Administrator
New Source Review Section
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Request for PSD Applicability Determination
PSD Permitting
Florida Furniture Industries
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Linero:

Florida Furniture Industries, Inc. (FFI) is requesting a PSD Applicability Determination for the two facilities it owns and operates in Palatka, Florida. In order for FFI to stay in business and allow 420 people to keep their jobs, the painting operations at Plant No. 1 must be shut down and shifted to Plant No. 3 on or before March 5, 2001. 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. In the year 2000, a total of 192.1 tons of VOC's were emitted at Plant No. 1 while 172.7 tons of VOC's were emitted at Plant No. 3. Plant No. 1 is not subject to PSD requirements because it has been in operation as a wood furniture manufacturing facility since 1934.

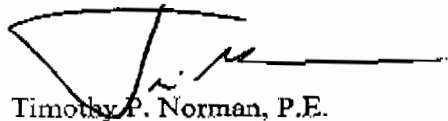
The dry kilns, boiler, and some woodworking operations would continue at Plant No. 1. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc. An exhibit showing the location of the two facilities is attached.

We would like to emphasize that FFI's economic survival hinges on being able to consolidate its painting/coating operations at Plant No. 3. FFI is not currently in a financial condition where it can spend large sums of money on VOC control equipment and their associated O&M costs.

A.A. Linero, P.E., Administrator
February 12, 2001
Page 2

We would appreciate a response as soon as possible. Contact me if you have any questions.

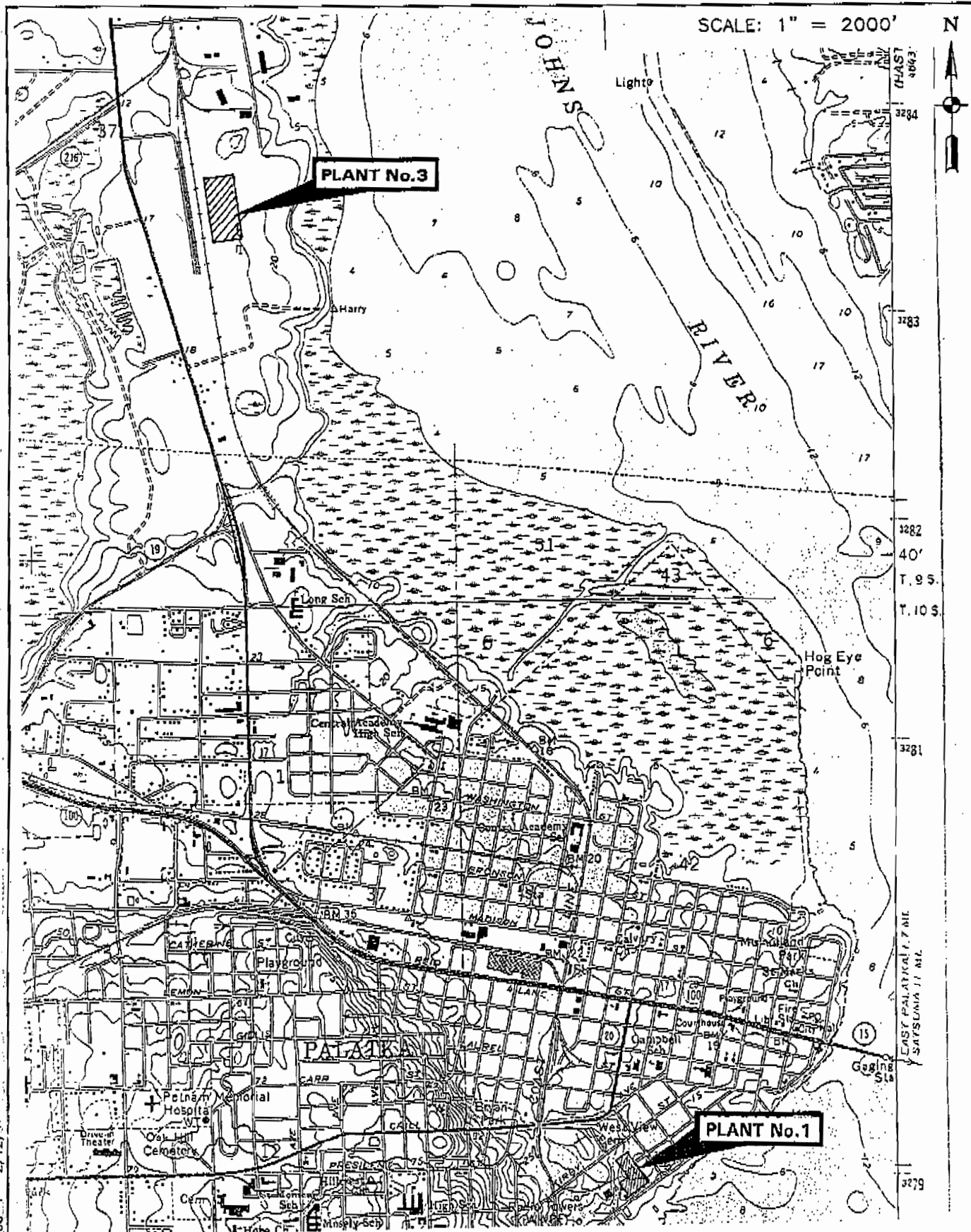
Sincerely,
Mittauer & Associates, Inc.

A handwritten signature in black ink, appearing to read 'Tim Norman', is written over a horizontal line.

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

TPN/bb
Enclosure

cc/enc: Florida Furniture



SCALE: 1" = 2000'



PLANT No.3

PLANT No.1

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4811-4 Highway 17, Orange Park, Florida (904) 278-0030

FLORIDA FURNITURE INDUSTRIES, INC.
Air Permitting
Facility Location Map
Putnam Conuty, Florida

Job No. 9110-08-1 2/12/51

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Al Linero

FROM: John Reynolds *JR*

DATE: June 1, 2001

SUBJECT: Florida Furniture Industries (FFI)

Attached is a draft construction permit that will consolidate finish coating operations at FFI's Plant No. 1 and Plant No. 3 in Palatka, Putnam County. These plants are approximately 2.7 miles apart. Through consolidation as a single facility (this is allowable per EPA's guidance memo dated May 21, 1998), the company will be able to relocate its coating operations from Plant No. 1 to Plant No. 3 and avoid triggering PSD review. According to FFI, installation of BACT controls at Plant No. 3 would likely put the company out of business since there has been a slowdown in business due to the economy.

There will be no increase in the total aggregate emissions from the consolidation. Modeling done in 1997 for Plant No. 3 showed less than significant impacts based on a higher material usage rate than will be encountered after the subject consolidation, so there is no reason to do further modeling for this permitting action. Total VOC/VHAP emissions will be limited to the average actual 1999-2000 emissions (371.55 TPY). Any increase will trigger retroactive PSD review. FFI has agreed to this approach.

Monday, June 4 is day 74. I recommend your approval and signature.

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. William A. Cratch
Vice President/Operations
Florida Furniture Industries
P. O. Box 610
Palatka, FL 32178

2. Article Number (Copy from service label)

7000 0600 0026 4129 8658

COMPLETE THIS SECTION ON DELIVERY

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

Kendall Johnson

C. Signature

Kendall Johnson

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Mr. William A. Cratch

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Florida Furniture Industries

Street, Apt. No., or PO Box No.

P. O. Box 610

City, State, ZIP+4

Palatka, FL 32178

PS Form 3800, February 2000

See Reverse for Instructions



4611-4 U.S. Highway 17
Orange Park, Florida 32003
Office: (904) 278-0030
Fax: (904) 278-0840

RECEIVED

APR 04 2001

March 14, 2001

BUREAU OF AIR REGULATION

A. A. Linero, P.E., Administrator
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Submittal of Permit Application
Air Permitting
Florida Furniture Industries
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Linero:

Florida Furniture Industries, Inc. (FFI) operates two wood furniture manufacturing plants in Putnam County, Plant No. 1 (Permit No. 1070002-002-AV) and Plant No. 3 (Permit No. 1070026-002-AV). The permit for Plant No. 1 expires May 13, 2003 while the permit for Plant No. 3 expires July 22, 2003. These plants are regulated for particulates, HAPs, and VOCs.

Florida Furniture plans to close down the painting operations at the Plant No. 1 site and shift all painting operations to the Plant No. 3 site on March 19, 2001 in order to improve the efficiency of their operations and reduce operating costs. No new facilities will be constructed at the Plant No. 3 site. Only the number of personnel and/or hours of operation will increase. All finish coating operations at the Plant No. 1 site will be terminated. There will be no net increase in VOC emissions from the two plants above the total annual average of 374.49 tons/yr for 1999 and 2000.

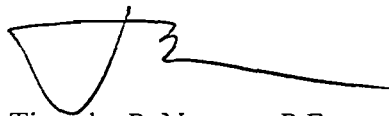
The dry kilns, boiler, and woodworking operations would continue at the Plant No. 1 site as currently permitted. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc. The boiler and woodworking operations at Plant No. 3 would remain essentially unchanged from their current permitted status.

A.A. Linero, P.E.
March 14, 2001
Page 2

Enclosed are two (2) copies of DEP Application Form 62-210.900(1) "Application for Air Permit - Title V Source" which reflect consolidating the finish coating operation at the Plant No. 3 site. It is our understanding that there will be no permit fees associated with this application.

Contact me if you have any questions or require additional information.

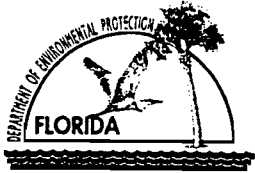
Sincerely,
Mittauer & Associates, Inc.

A handwritten signature in black ink, appearing to read 'Timothy P. Norman', with a stylized flourish extending to the right.

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

TPN/bb

cc: Florida Furniture



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Florida Furniture Industries, Inc.	
2. Site Name: Plant No. 1 and Plant No. 3	
3. Facility Identification Number: 1070002 and 1070026 [] Unknown	
4. Facility Location: Street Address or Other Locator: 722 River Street (Plant No. 1) and 160 Comfort Road (Plant No. 3) City: Palatka County: Putnam Zip Code: 32177	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Timothy P. Norman, P.E., Manager of Environmental Services	
2. Application Contact Mailing Address: Organization/Firm: Mittauer & Associates, Inc. Street Address: 4611-4 U.S. Highway 17 City: Orange Park State: FL Zip Code: 32003	
3. Application Contact Telephone Numbers: Telephone: (904) 278-0030 Fax: (904) 278-0840	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- ☒ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: N/A

Operation permit number to be revised: 1070002-002-AV, 1070026-002-AV

- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- ☐ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

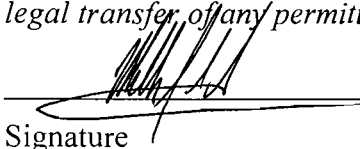
Reason for revision: _____

Air Construction Permit Application N/A

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: William A. Cratch, VP Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Furniture Industries, Inc. Street Address: P.O. Box 610 City: Palatka State: FL Zip Code: 32178
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (904) 328-3444 Fax: (904) 329-5455
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> <div style="display: flex; justify-content: space-between;"><div>Signature </div><div>Date <u>03/19/01</u></div></div>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Timothy P. Norman, P.E. Registration Number: 41128
2. Professional Engineer Mailing Address: Organization/Firm: Mittauer & Associates, Inc. Street Address: 4611-4 U.S. Highway 17 City: Orange Park State: Florida Zip Code: 32003
3. Professional Engineer Telephone Numbers: Telephone: (904) 278-0030 Fax: (904) 278-0840

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

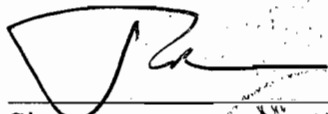
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

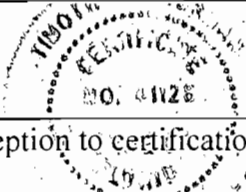
If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



Signature

(seal)



3/14/01

Date

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Wood Fired Boiler at Plant No. 1	N/A	0
002	Dry Kiln Nos. 3 & 4 at Plant No. 1	N/A	0
003	Woodworking Dust Collection Plant No. 1	N/A	0
004 (001)*	Wood Fired Boiler at Plant No. 3	N/A	0
005 (002) *	Woodworking Dust Collection at Plant No. 3	N/A	0
006 (003) *	Finish Coating Operation at Plant No. 3	N/A	0
	* Number in parenthesis represents current emissions ID # for Plant No. 3		

Application Processing Fee

Check one: ☐ Attached - Amount: \$ _____ ☒ Not Applicable

Construction/Modification Information**1. Description of Proposed Project or Alterations:**

Project will involve consolidating all finish coating operations at Plant No. 3. Finish coating operations will no longer be performed at Plant No. 1. No new facilities will be constructed at Plant No. 3, only the number of personnel and/or hours of operation will increase at Plant No. 3. There will be no net increase in VOC emissions between the two plants. The increase in VOC emissions at Plant No. 3 will be offset by the decrease in VOC emissions at Plant No. 1.

2. Projected or Actual Date of Commencement of Construction: Plant No. 1 began operation in 1934. Plant No. 3 was constructed in 1985.

3. Projected Date of Completion of Construction: N/A

Application Comment

N/A

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3278.9 (Plant No. 1) Zone: 17 East (km): 436.4 North (km): 3283.4 (Plant No. 3)			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 29°-38'-25" N Longitude (DD/MM/SS): 81°-38'- 5" W (Plant No. 1) Latitude (DD/MM/SS): 29°-40'-50" N Longitude (DD/MM/SS): 81°-39'- 25"W (Plant No. 3)			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 25	6. Facility SIC(s): 2511
7. Facility Comment (limit to 500 characters): Florida Furniture Industries, Inc. manufacturers wood bedroom furniture.			

Facility Contact

1. Name and Title of Facility Contact: Kenneth G. Loyless, Safety Director		
2. Facility Contact Mailing Address: P.O. Box 610 Organization/Firm: Florida Furniture Industries, Inc. Street Address: 722 River Street (Plant No. 1); 160 Comfort Road (Plant No. 3) City: Palatka State: FL Zip Code: 32178		
3. Facility Contact Telephone Numbers: Telephone: (904) 328-3444 Fax: (904) 328-5455		

Facility Regulatory Classifications**Check all that apply:**

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input checked="" type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): Hours of operation of the finish coating operations are restricted to <u>1926.5</u> hours/year to maintain total VOC emissions to less than <u>371.55</u> TPY.	

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.

62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions
62-213.205 F.A.C: Annual Emissions Fee	CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS,
62-213.400 F.A.C: Permits and Permit Revisions Required.	62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-213.410 F.A.C: Changes without Permit Revision	62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.
62-213.420 F.A.C: Permit Applications	62-296.410, F.A.C.: Carbonaceous Fuel , Burning Equipment.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
CO	B				
PM	B				
PM10	B				
VOC	A	-	374.49	OTHER	001, 002, 004, 006
H020	B				
H046	B				
H047	B				
H053	B				
H060	B				
H085	B				
H095	B				
H096	B				
H113	B				
H115	B				
H120	B				
H123	B				
H132	B				
H169	A				
H182	B				
H186	A				

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>1A3A</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>1B & 3B</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID: <u>1C & 3C</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input checked="" type="checkbox"/> Attached, Document ID: <u>1D & 3D</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested <u>1E & 3E</u>
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment: N/A

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

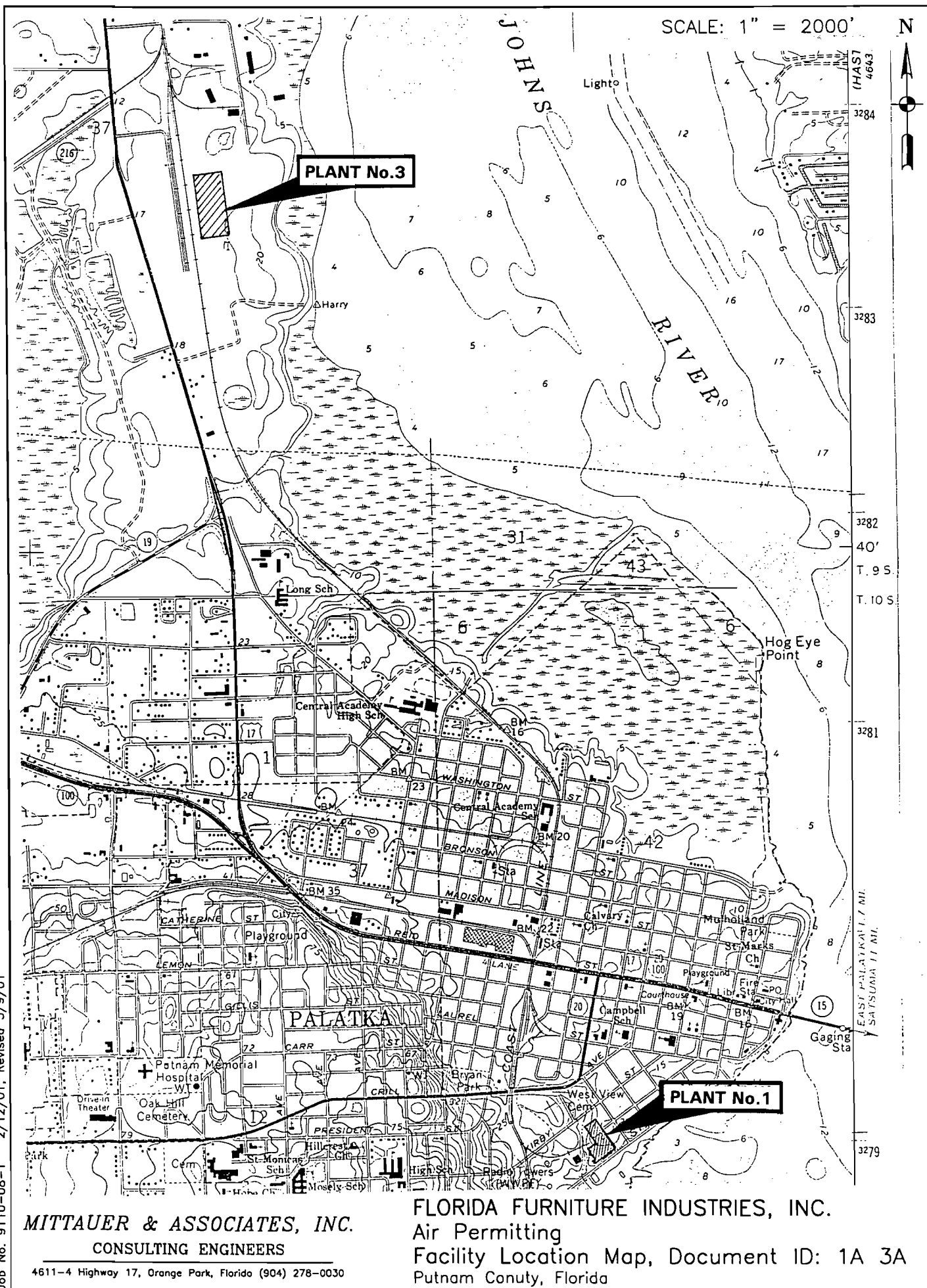
EXHIBITS 1A 3A

1B, 3B

1C, 3C

1D, 3D

1E, 3E



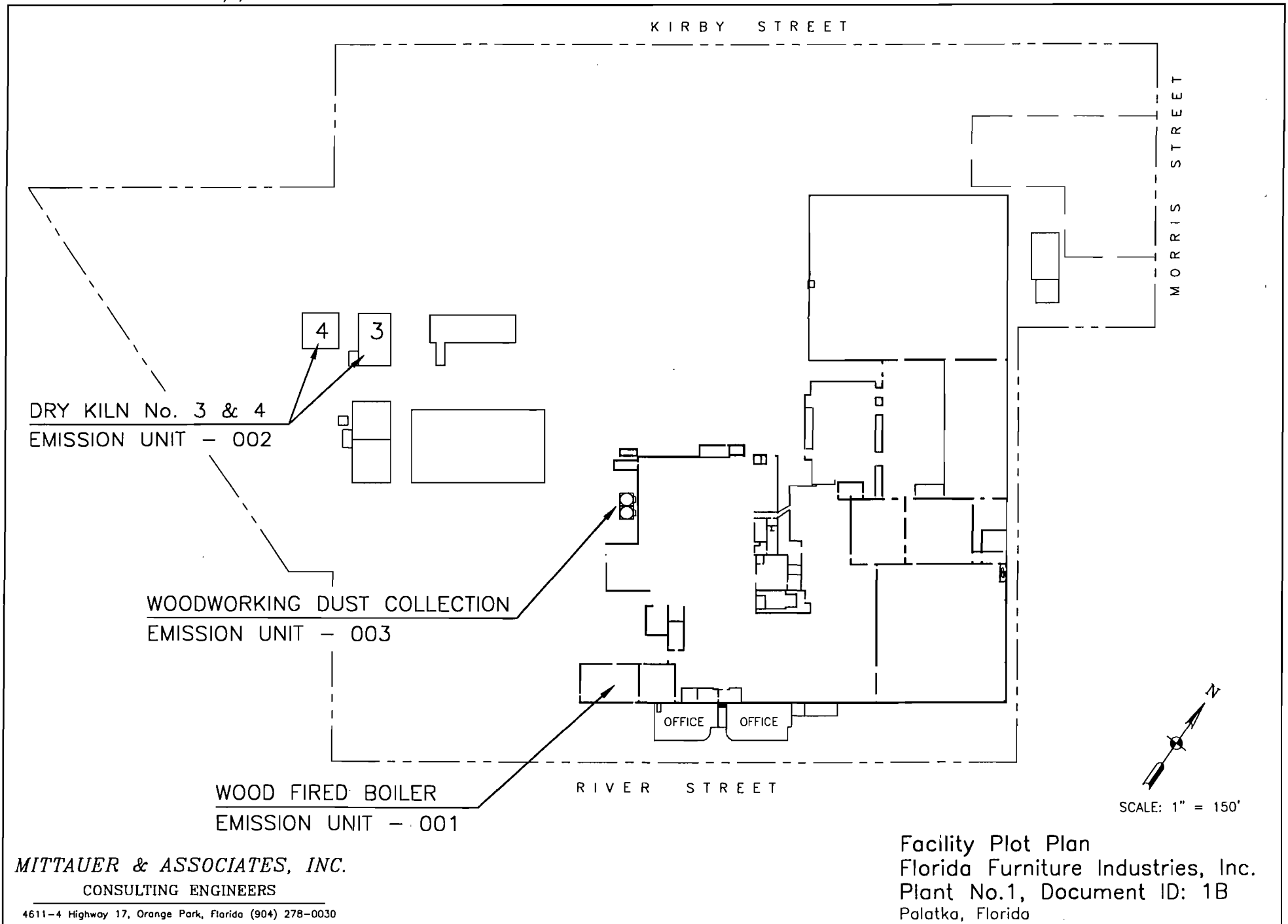
MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

FLORIDA FURNITURE INDUSTRIES, INC.

Air Permitting

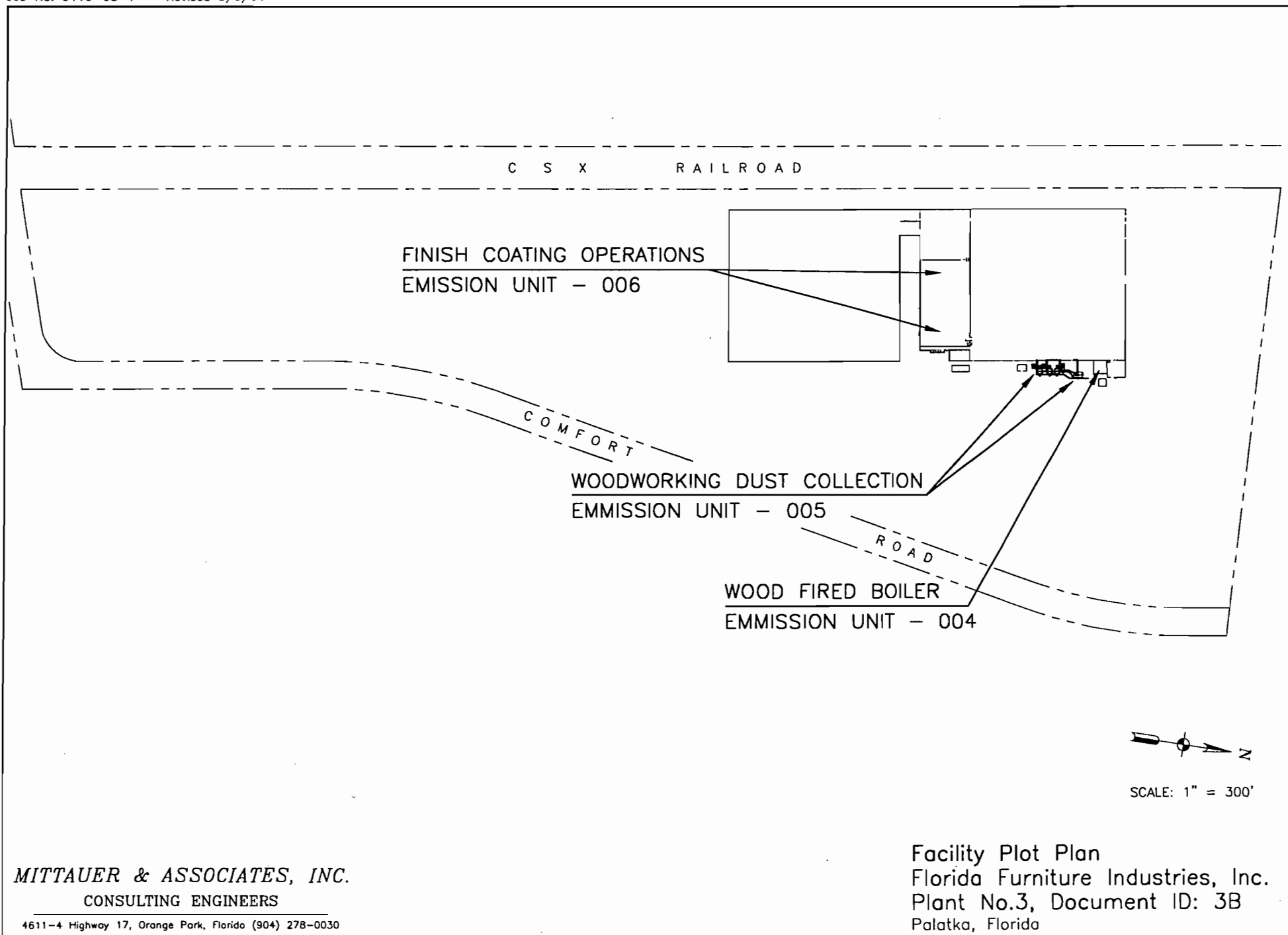
Facility Location Map, Document ID: 1A 3A
Putnam County, Florida

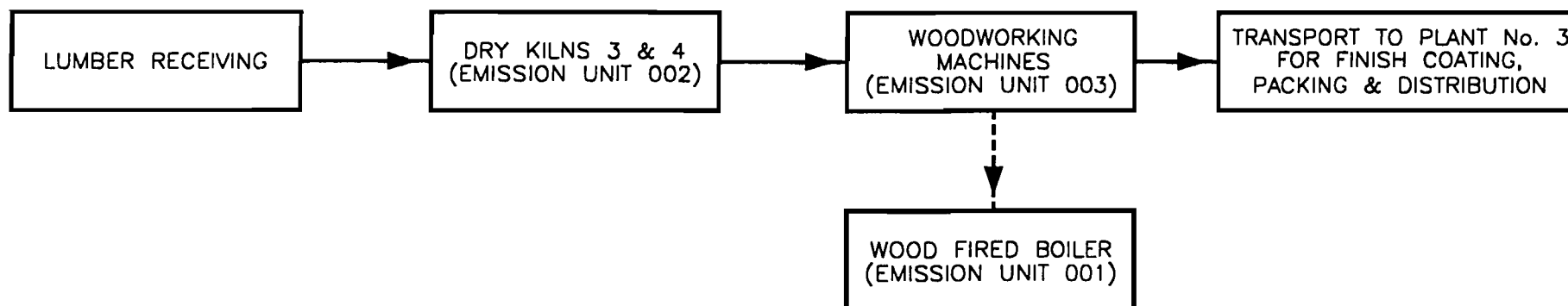


MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

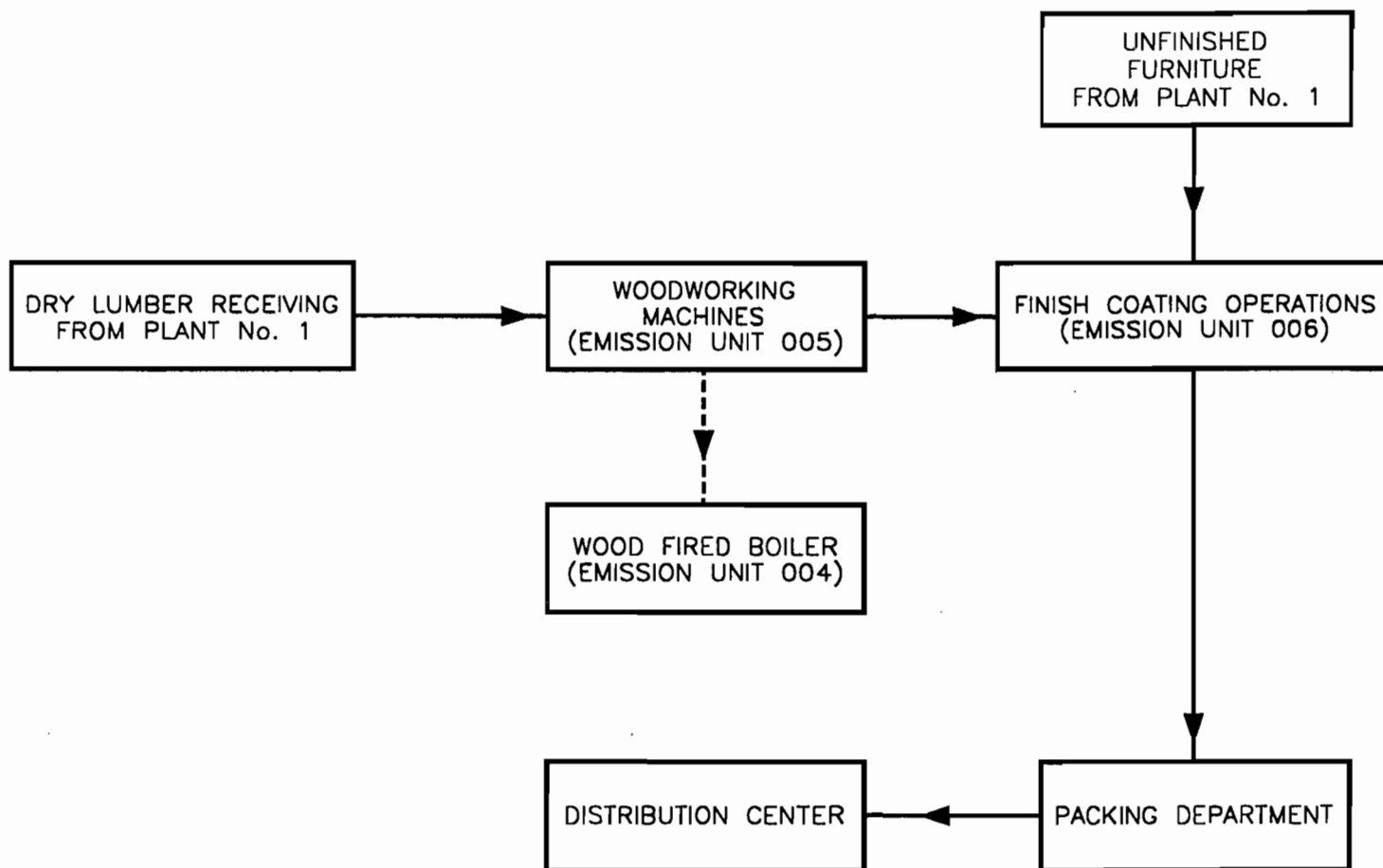




MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

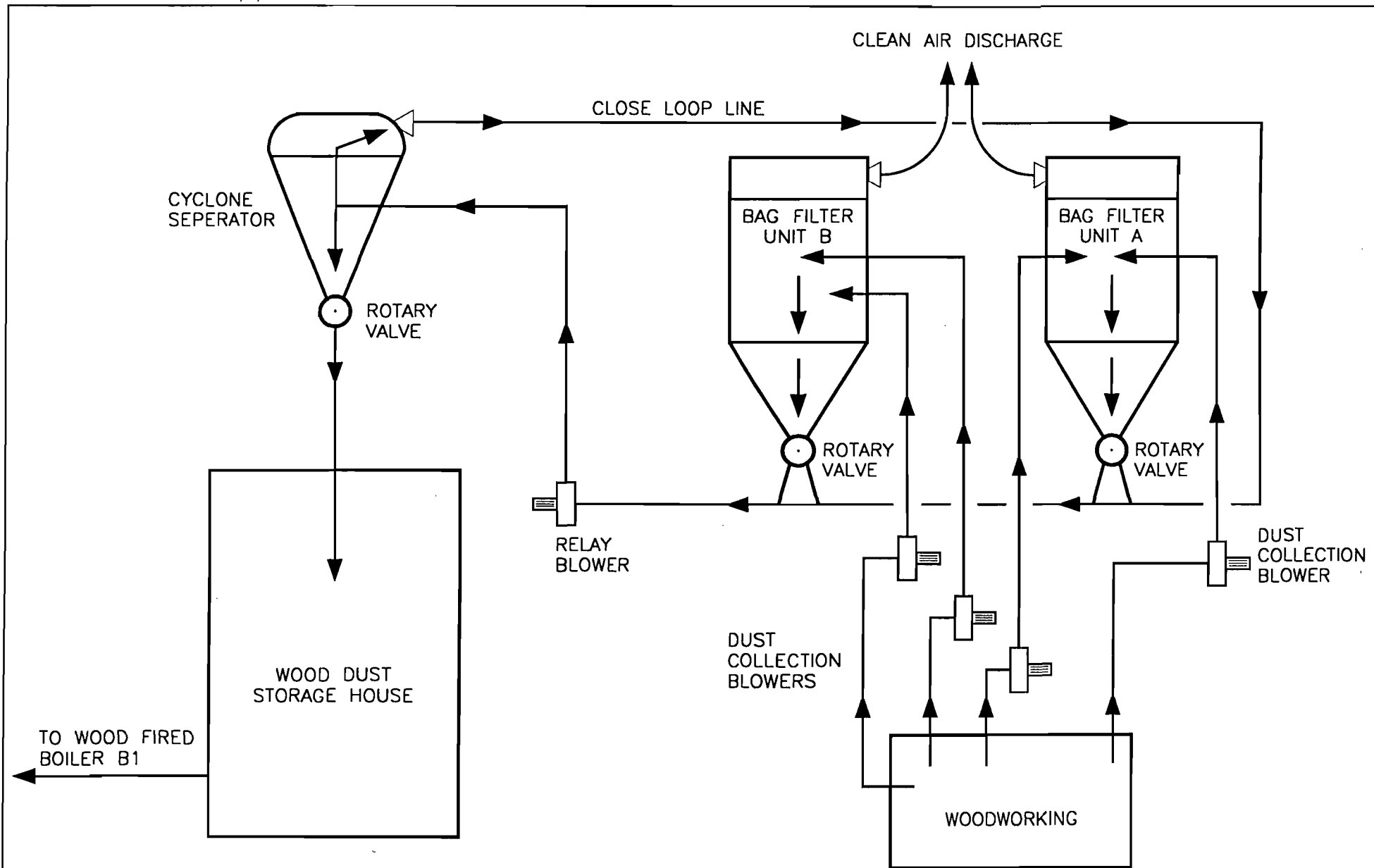
Facility Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1C
Palatka, Florida



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4611-4 Highway 17, Orange Park, Florida (904) 278-0030

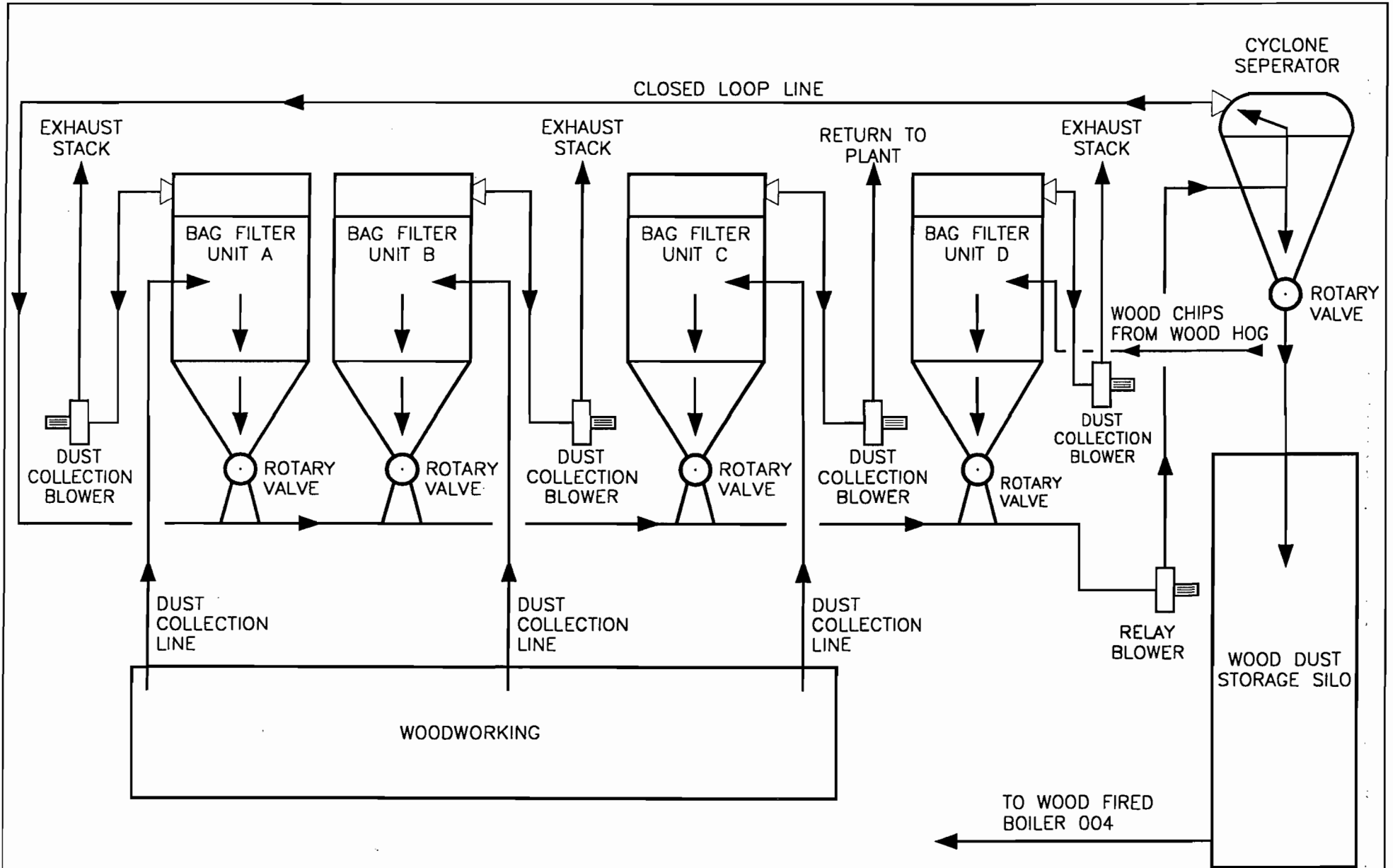
Facility Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3C
Palatka, Florida



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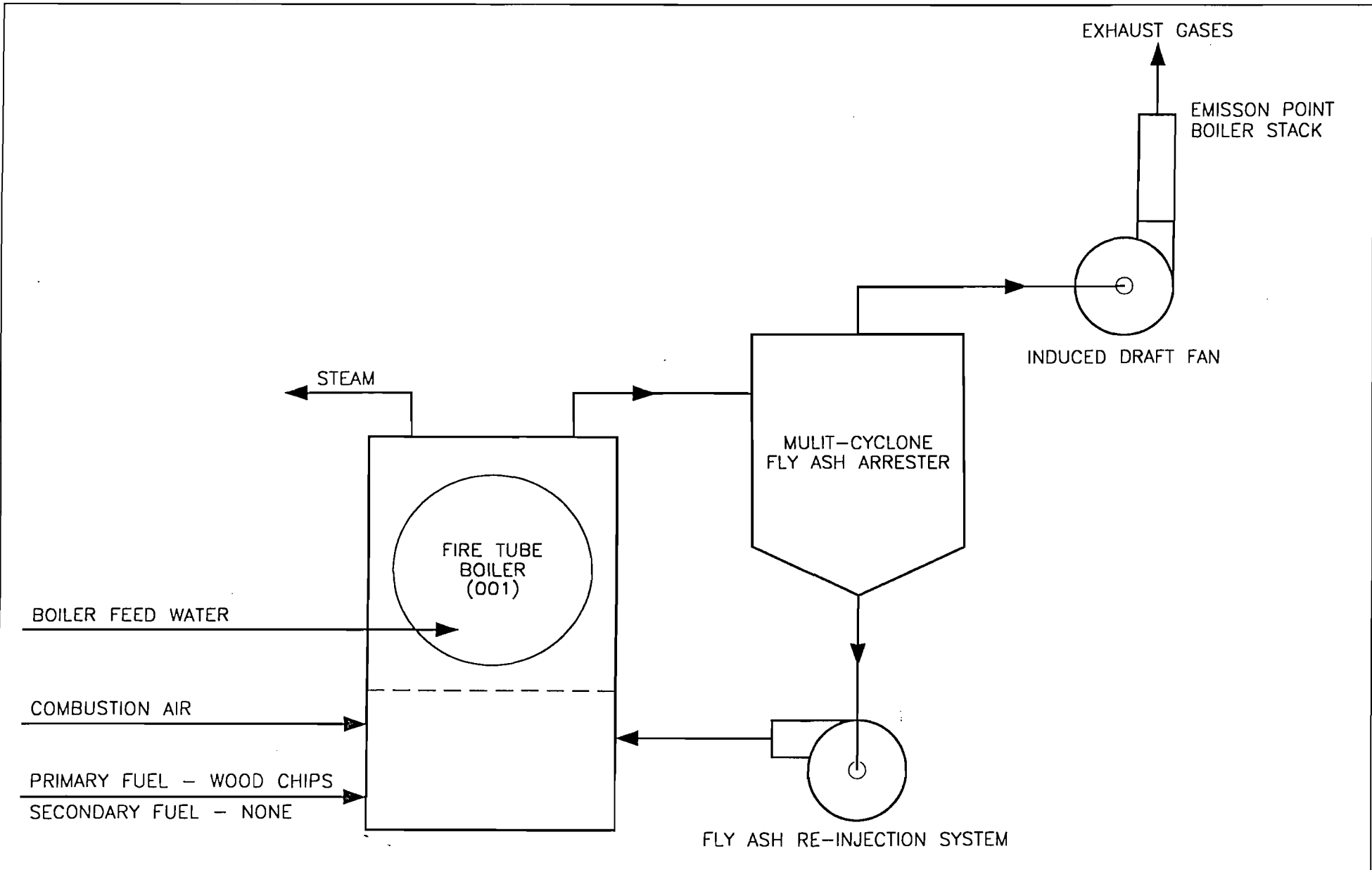
Woodworking Dust Collection Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1D
Palatka, Florida

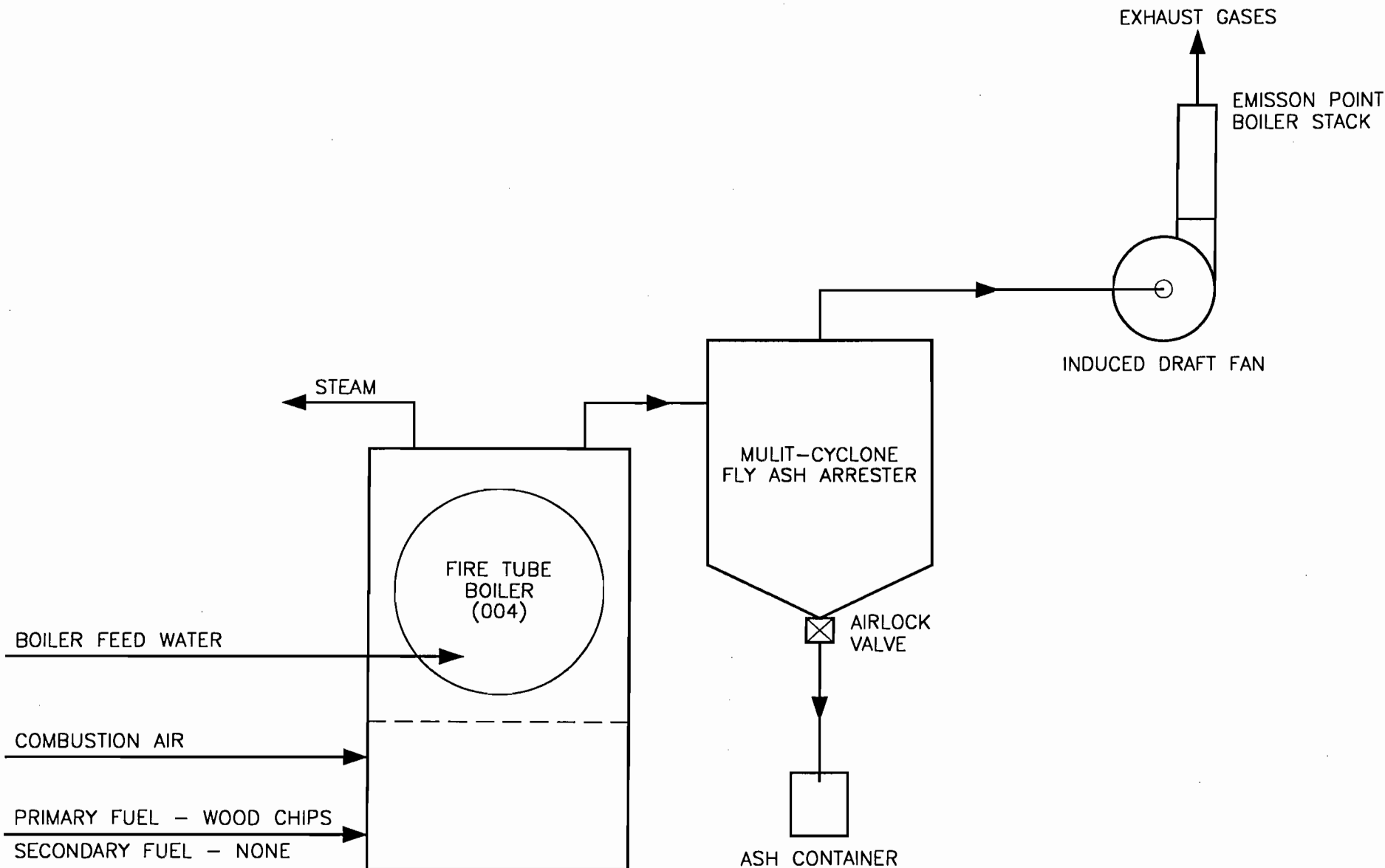


MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Woodworking Dust Collection Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3D
Palatka, Florida





MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3E
Palatka, Florida

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Wood fired boiler at Plant No. 1			
4. Emissions Unit Identification Number:			
ID: 001		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	1963	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Boiler provides steam to Plant No. 1 for heating of dry kilns and for heating of the manufacturing facility.			

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	18.24	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	1,960 lb/hr	23.52 ton/day
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Throughput based on current permitted rate.		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 001		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Boiler stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 50 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 491 °F	9. Actual Volumetric Flow Rate: 6,600 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3278.9			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC): 1-02-009-06	3. SCC Units: Tons burned	
4. Maximum Hourly Rate: 0.98 tons/hr	5. Maximum Annual Rate: 8,585 tons/yr	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0	8. Maximum % Ash: 1.2	9. Million Btu per SCC Unit: 18.61
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment _____ of _____ N/A

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

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

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 7.47 lb/hour 32.70 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 100% Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): $\frac{13.6 \text{ lbs / ton} \times 4,809.24 \text{ tons / yr}}{2000 \text{ lbs / ton}} = 32.70 \text{ tons / yr} = 7.47 \text{ lbs / hr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 40% Maximum Period of Excess Opacity Allowed: 2 min/hour	
4. Method of Compliance: Boiler operators would monitor equipment functions and stack VE. Any malfunction immediately reported.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**Continuous Monitoring System:** Continuous Monitor N/A of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

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

Supplemental Requirements

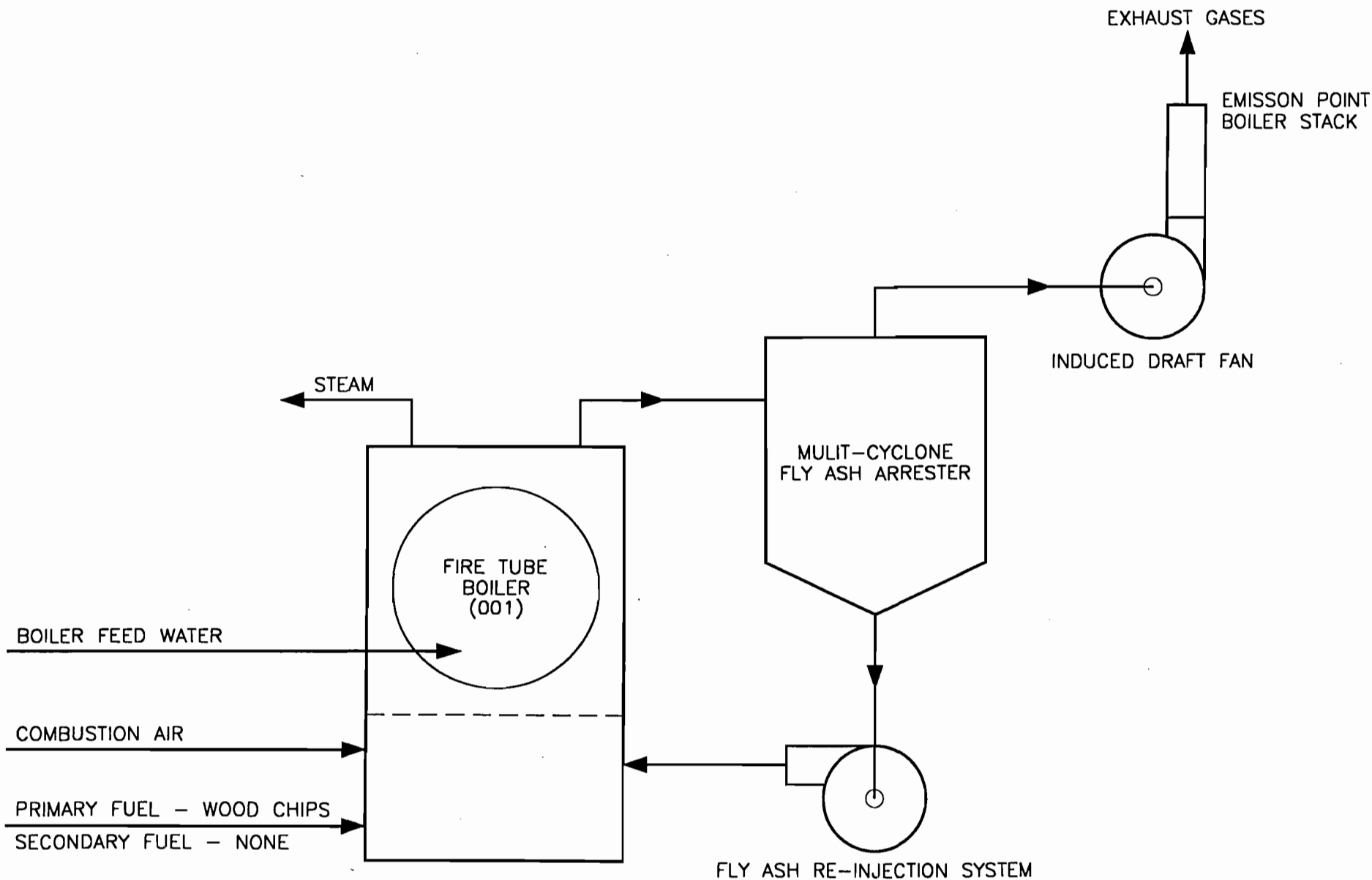
1.	Process Flow Diagram [X] Attached, Document ID: <u> 1E </u>	[] Not Applicable	[] Waiver Requested
2.	Fuel Analysis or Specification [] Attached, Document ID: _____	[X] Not Applicable	[] Waiver Requested
3.	Detailed Description of Control Equipment [] Attached, Document ID: _____	[X] Not Applicable	[] Waiver Requested
4.	Description of Stack Sampling Facilities [] Attached, Document ID: _____	[X] Not Applicable	[] Waiver Requested
5.	Compliance Test Report [X] Attached, Document ID: <u> 1F </u> [] Previously submitted, Date: _____ [] Not Applicable		
6.	Procedures for Startup and Shutdown [] Attached, Document ID: _____	[X] Not Applicable	[] Waiver Requested
7.	Operation and Maintenance Plan [] Attached, Document ID: _____	[X] Not Applicable	[] Waiver Requested
8.	Supplemental Information for Construction Permit Application [] Attached, Document ID: _____	[X] Not Applicable	
9.	Other Information Required by Rule or Statute [] Attached, Document ID: _____	[X] Not Applicable	
10.	Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>		

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT IE

Wood Fired Boiler Process Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

EXHIBIT 1F

**Visible Emissions Testing for Wood
Fired Boiler 001 at Plant No. 1**

COPY

**SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING**

FROM

**PLANT 1
FLORIDA FURNITURE INDUSTRIES
722 RIVER STREET
PALATKA, FLORIDA 32177**

**WOOD FIRED BOILER
DUST COLLECTORS A AND B**

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

1070002-AV

PREPARED FOR

**FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA**

PREPARED BY

**ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174**


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	203A	203B	Other
--------------------------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 1		
Street Address	712 River Street		
City	State	Zip	
PALATKA	FL	32177	

Process	Unit #	Operating Mode
Wood Boiler		See PFD data
Control Equipment		Operating Mode
N/A		N/A

Describe Emission Point	
~36" Circular Stack-gray in color	

Height of Emis. Pt.	Start	End	Height of Emis. Pt. Rel. to Observer	Start	End
~50'	Same		~50'	Same	
Distance to Emis. Pt.	Start	End	Direction to Emis. Pt. (Degrees)	Start	End
~125'	Same		280°	Same	

Vertical Angle to Obs. Pt.	Start	End	Direction to Obs. Pt. (Degrees)	Start	End
~3°	Same		280°	Same	
Distance and Direction to Observation Point from Emission Point					
Start 125' - 280° End Same					

Describe Emissions	
Start	End
Coning Plume	Same
Emission Color	Water Droplet Plume
Start black End Same	Attached <input type="checkbox"/> Detached <input type="checkbox"/> None <input checked="" type="checkbox"/>

Describe Plume Background	
Start	End
SKY	Same
Background Color	Sky Conditions
Start blue-whitens End Same	Start broken End Same
Wind Speed	Wind Direction
Start 3-5 End Same	Start ESE End Variable
Ambient Temp.	Wet Bulb Temp.
Start 60° End 60°	Rel Percent

Source Layout Sketch		Draw North Arrow
		<input type="checkbox"/> TN <input checked="" type="checkbox"/> DN
Longitude	Latitude	Destination

Additional Information

Form Number	Page	of
	1	1
Continued on VEO Form Number		

Observation Date		Time Zone		Start Time	End Time
				0852	0922
Sec	0	15	30	45	Comments
1	0	0	0	0	
2	0	5	5	5	
3	10	10	10	10	
4	15	10	15	15	
5	15	15	15	5	
6	0	0	0	0	
7	0	0	0	5	
8	5	0	0	0	
9	0	0	0	0	
10	0	5	0	5	
11	5	0	5	5	
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13	5	0	0	0	
14	5	0	0	0	
15	15	15	10	10	
16	10	15	10	5	
17	5	10	10	5	
18	5	5	0	0	
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22	5	5	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	5	0	0	
27	10	5	10	10	
28	10	10	15	15	
29	10	10	10	10	
30	5	0	0	0	

Observer's Name (Print)	Dannie Leaper	
Observer's Signature	Date	1-30-01
Organization	Astell Environmental Services	
Certified by	Date	12-6-01
E.T.A.		

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

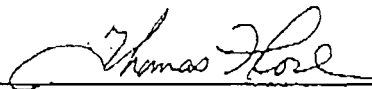
Certificate Number

Jacksonville, Florida

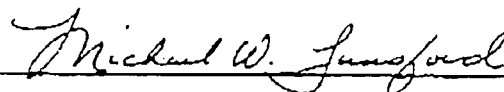
Location

December 6, 2000

Date of Issue



President



Director of Training

III. EMISSIONS UNIT INFORMATION

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(All Emissions Units)

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1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Dry kiln Nos. 3 & 4 at Plant No. 1.			
4. Emissions Unit Identification Number:			
ID: 002		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	No. 3 8/24/84 No. 4 7/24/00	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Dry kilns loaded with poplar lumber on a 4-day cycle. Wet lumber (approximately 25% moisture) is dried to a moisture content of 8%. The dry kilns are heated by steam from the wood burning boiler located at Plant No. 1. Drying temperature is maintained by controls at 170° F. Kilns 3 and 4 are in separate buildings.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

N/A

2. Control Device or Method Code(s): N/A

Emissions Unit Details

1. Package Unit:	
Manufacturer: BOLD Designs	Model Number: 4290
2. Generator Nameplate Rating: N/A MW	
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	200,000 bdf/4 days = 18,200,000 bdf/yr	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Kilns operate 24-hours per day, 7 days per week, 52 weeks per year. Cycle time is approximately 4 days or 91 cycles per year. An average of 8,928,610 bdf/yr of lumber was dried in the kilns in 1999 and 2000.		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 002		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No VE.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: 002			
5. Discharge Type Code: R	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: 170 °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Kiln No. 3 = 23 feet Kiln No. 4 = 29	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3283.9			
14. Emission Point Comment (limit to 200 characters): Kiln Nos. 3 and 4 emission points are wall vents front and rear.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of

1. Segment Description (Process/Fuel Type) (limit to 500 characters): N/A – Steam is generated by wood fired boiler (001).		
2. Source Classification Code (SCC): N/A		3. SCC Units: N/A
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment of N/A

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

[illegible]

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.44 lb/hour 1.92 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.211 lb/1000 bdf Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters): $\frac{(0.211 \text{ lb VOC} / 1000 \text{ bdf})(200,000 \text{ bdf} / 4 \text{ days})}{(24 \text{ hr day}^{-1})} = 0.44 \text{ lb hr}^{-1}$ $\frac{(0.211 \text{ lb VOC} / 1000 \text{ bdf})(18,200,000 \text{ bdf} / \text{yr}^{-1})}{(2000 \text{ lbs ton}^{-1})} = 1.92 \text{ tons yr}^{-1}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation N/A of

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

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of

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

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

Supplemental Requirements

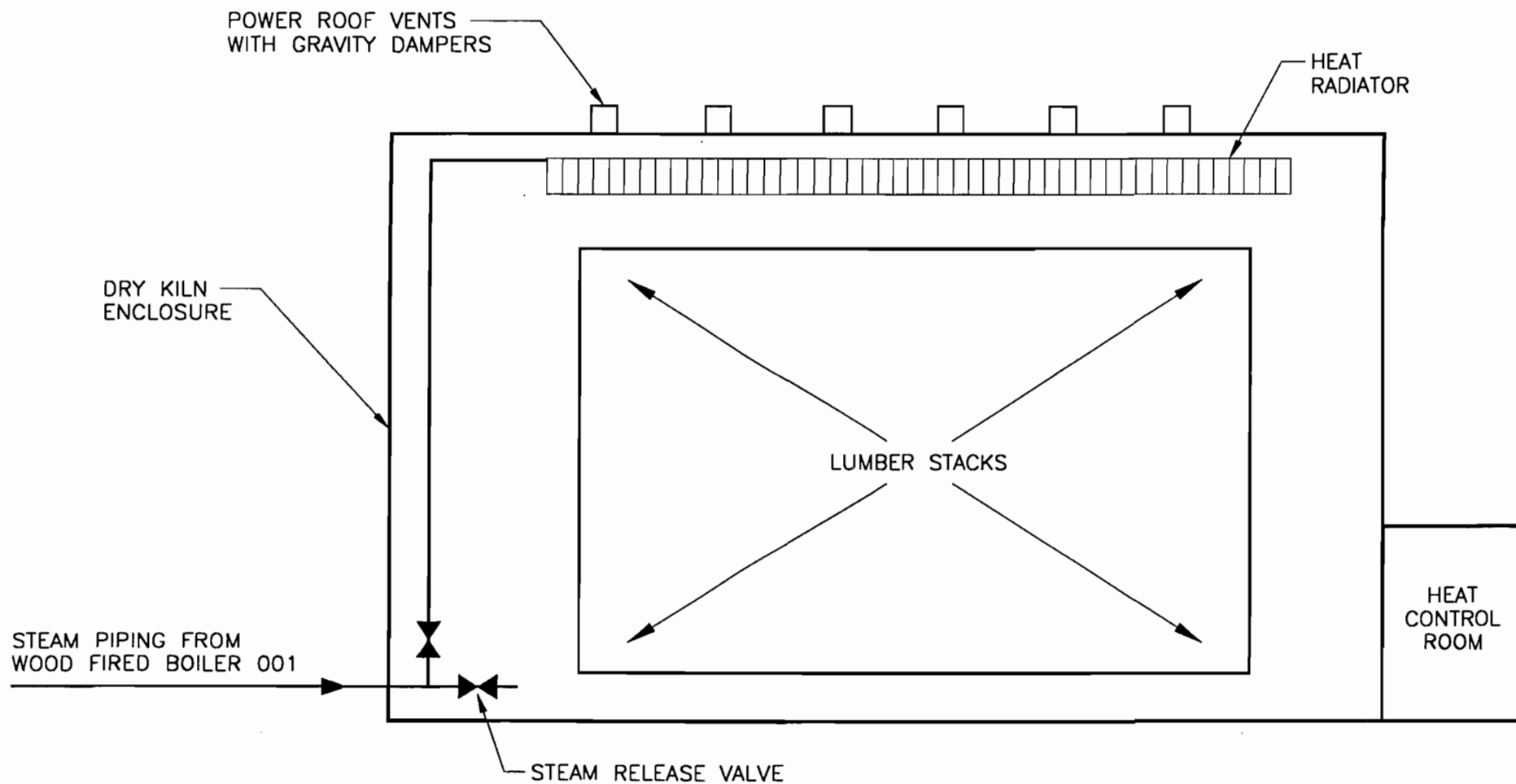
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>1G</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 1G

Dry Kiln Process Flow Diagram



DRY KILN No. 3 & 4
EMISSION UNIT DK1

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Wood dust collection unit consisting of 2 bag filter units and cyclone unit at Plant No. 1 site.			
4. Emissions Unit Identification Number:			
ID: 003		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	Bag Filters 7/89 Cyclone 4/97	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Wood dust and chips originate from the woodworking area. The dust and chips are pneumatically conveyed under vacuum to the wood storage house via closed loop system. Air is filtered at Bag Filter Unit A and B prior to being discharged to the atmosphere.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter A

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 7,044 S.F. of filter area

456 Filter Bags, each 12' long

16 oz. Single Polyester Felt Filter Bags, 99.96% efficient @ 3 microns

Air to Cloth Ratio – 9.76:1

Filtered Air – 68,780 CFM

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:		
Manufacturer:	Pneumafil Corporation	Model Number: 13.5-456-12
2. Generator Nameplate Rating: N/A MW		
3. Incinerator Information: N/A		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter B

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 7,044 S.F. of filter area

456 Filter Bags, each 12' long

16 oz. Single Polyester Felt Filter Bags, 99.96% efficient @ 3 microns

Air to Cloth Ratio – 9.52:1

Filtered Air – 67,035 CFM

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: 13.5-456-12

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	5,236 lb/hr	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Maximum capacity = 5,236 lb/hr as per phone conversation with Chas Campbell of Clean Air Systems, Statesville, NC, (704) 873-9998. Current throughput based on year 2000 data is estimated at 2,615 lb/hr.</p>		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
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62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
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62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 003		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. Clean air discharge point on Bag Filter Unit A. 2. Clean air discharge point on Bag Filter Unit B. 3. Cyclone has no emission point as its air discharge is returned to the bag filters.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: H	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Filters A & B = 50 feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3278.9			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): N/A		
2. Source Classification Code (SCC): N/A		3. SCC Units: N/A
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

[illegible]

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM/PM10	2. Total Percent Efficiency of Control: 99.96
3. Potential Emissions: 2.09 lb/hour 9.17 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.04 % Reference: Manufacturer's data.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): $5,236 \text{ lb/hr} \times 0.04\% = 2.09 \text{ lb/hr}$ $\frac{2.09 \text{ lb/hr} \times 8,760 \text{ hrs/yr}}{2000 \text{ lbs/ton}} = 9.17 \text{ tons/yr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation N/A of _____

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: N/A % Maximum Period of Excess Opacity Allowed: N/A min/hour	
I. Method of Compliance: Testing of VE at minimum of 90% of operating rate.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

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

Supplemental Requirements

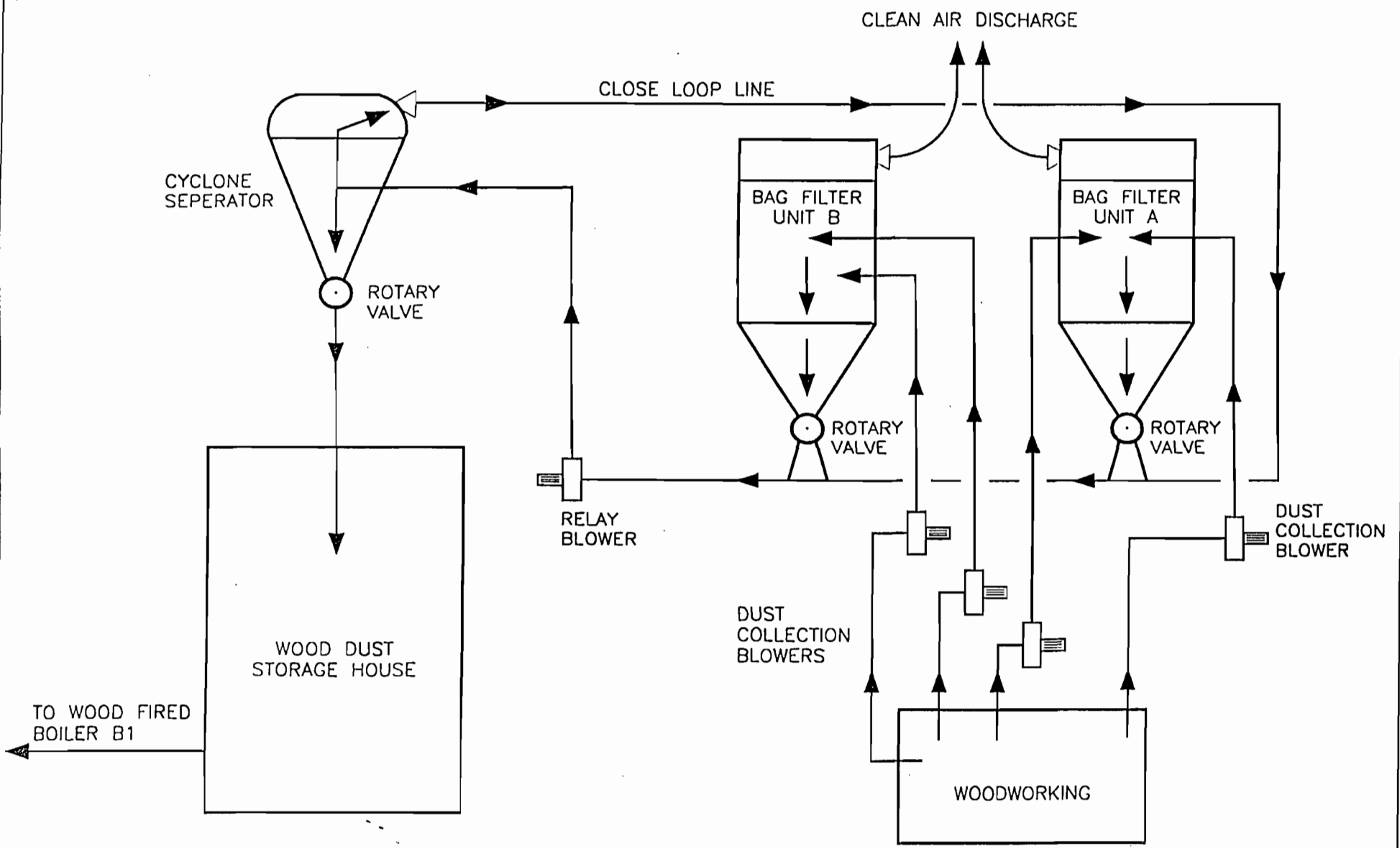
1. Process Flow Diagram [X] Attached, Document ID: <u>1D</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: _____ [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Compliance Test Report [X] Attached, Document ID: <u>1H</u> [] Previously submitted, Date: _____ [] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 1D

Woodworking Dust Collection Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

EXHIBIT 1H

**Visible Emissions Testing for Wood Dust
Collection at Plant No. 1**

COPY

**SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING**

FROM

**PLANT 1
FLORIDA FURNITURE INDUSTRIES
722 RIVER STREET
PALATKA, FLORIDA 32177**

**WOOD FIRED BOILER
DUST COLLECTORS A AND B**

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

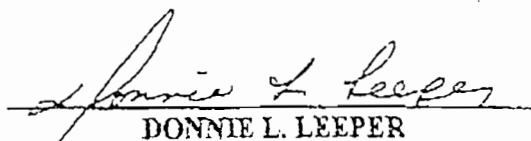
1070002-AV

PREPARED FOR

**FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA**

PREPARED BY

**ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174**


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	Method 9	203A	203B	Other
--------------------------	----------	------	------	-------

Company Name	Florida Furniture		
Facility Name	Plant 1		
Street Address	722 River Street		
City	Palatka	State	FL
		Zip	32177

Process	Dust collector	Unit #	A	Operating Mode	See test data
Control Equipment	Baghouse			Operating Mode	Continuous

Describe Emission Point			
36" X 36" Square			
Duct on Side of Baghouse			
Height of Emiss. Pt.	Start ~ 35'	End Same	Height of Emiss. Pt. Rel. to Observer
Start ~ 35'	End Same	Start ~ 30'	End Same
Distance to Emiss. Pt.	Start ~ 100'	End Same	Direction to Emiss. Pt. (Degrees)
Start ~ 100'	End Same	Start 282°	End Same

Vertical Angle to Obs. Pt.	Start ~ 1°	End Same	Direction to Obs. Pt. (Degrees)
Start ~ 1°	End Same	Start 282°	End Same
Distance and Direction to Observation Point from Emission Point			
Start ~ 100 - 282°	End Same		

Describe Emissions	
Start CLEAR	End Same
Emission Color	Water Droplet Plume
Start CLEAR	End Same
Attached <input type="checkbox"/>	Detached <input type="checkbox"/>
None <input checked="" type="checkbox"/>	

Describe Plume Background	
Start SKY	End Same
Background Color	Sky Conditions
Start Blue	End Same
Start Mostly Cloudy	End Same
Wind Speed	Wind Direction
Start 3-5	End Same
Start ESE	End Same
Ambient Temp.	Wet Bulb Temp.
Start 60°	End 60°
	Rel. Percent

Source Layout Sketch		Draw North Arrow
		<input type="checkbox"/> IN <input checked="" type="checkbox"/> SUN
Longitude	Latitude	Direction

Additional Information	

Form Number		Page	1
Continued on VEO Form Number			

Observation Date	1-30-01	Time Zone	EST	Start Time	0814	End Time	0844
Sec	0	15	30	45	Comments		
Min	0	0	0	0			
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
17	0	0	0	0			
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21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print)	Donnie Leeper	
Observer's Signature		
Organization	Asthma Environmental Services	
Verified by	EPA	Date 12-6-00

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	205A	205B	Other
(Method 1)			

Company Name	Florida Furniture Industries
Facility Name	Plant 1
Street Address	717 River Street
City	MIAMI
State	FL
Zip	33177

Process	Paint Collector	Unit #	A	Operating Mode	See Adj. Data
Control Equipment	Baghouse	Operating Mode	Continuous		

Describe Emission Point			
36" x 36" square duct on side of baghouse			
Height of Emiss. Pt.	Start ~35'	End Same	Height of Emiss. Pt. Rel. to Observer
Start ~35'	End Same	Start ~30'	End Same
Distance to Emiss. Pt.	Start 105'	End Same	Direction to Emiss. Pt. (Degrees)
Start 105'	End Same	Start 282°	End Same

Vertical Angle to Obs. Pt.	Start	End	Direction to Obs. Pt. (Degrees)
Start	End	Start 282°	End Same
Distance and Direction to Observation Point from Emission Point			
Start 105' - 282°	End	Same	

Describe Emissions			
Start Clear	End Same	Water Droplet Plume	
Emission Color	Start Clear	End Same	Attached <input type="checkbox"/> Detached <input type="checkbox"/> None <input checked="" type="checkbox"/>

Describe Plume Background			
Start Sky	End Same	Sky Conditions	
Background Color	Start Blue	End Same	Start mostly
Wind Speed	Start 3-5	End Same	End Same
Ambient Temp.	Start 60°	End 60°	Wet Bulb Temp.
Start 60°	End 60°	Start 65°	End Same

Source Layout Sketch		Draw North Arrow
		<input type="checkbox"/> IN SUN <input checked="" type="checkbox"/> OUT SUN
Longitude	Latitude	Declination

Additional Information	
------------------------	--

Form Number	Page
Continued on VEO Form Number	

Observation Date	Time Zone	Start Time	End Time		
1-30-01	EST	0814	0844		
Sec	0	15	30	45	Comments
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
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25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)	Bonnie Leeper
Observer's Signature	Bonnie Leeper
Date	1-30-01
Organization	Atotech Environmental Services
Contracted By	ETA
Date	12-6-00

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9
and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not
exceed 7.5% opacity and no single error exceeding
15% opacity was incurred during the certification test
conducted by Eastern Technical Associates of Raleigh,
North Carolina. This certificate is valid for six months
from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

Thomas Hore

President

Michael W. Langford

Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Wood Fired Boiler fed by wood chips and sawdust from woodworking dust collection system (005) at Plant No. 3.			
4. Emissions Unit Identification Number: ID: 001 (Renumber to 004)		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code: A	6. Initial Startup Date: 12/85	7. Emissions Unit Major Group SIC Code: 2511	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters) Boiler provides steam to plant for drying ovens in the finish coating operation and for heating of the manufacturing facility.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Wood burning boiler fed by wood chips and sawdust with multi-cyclone Fly Ash Arrestor.

2. Control Device or Method Code(s): 076

Emissions Unit Details

1. Package Unit:		
Manufacturer:	Hurst Firebox System	Model Number: -
2. Generator Nameplate Rating:	N/A	MW
3. Incinerator Information: N/A		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	8.74	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	1,068 lb/hr	12.82 tons/day
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Capacity based on original permitted rates.		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 004		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Boiler stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 35 feet	7. Exit Diameter: 1.8 feet	
8. Exit Temperature: 450 °F	9. Actual Volumetric Flow Rate: 3,700 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.3 North (km): 3283.6			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC): 1-02-009-06		3. SCC Units: tons burned
4. Maximum Hourly Rate: 0.54	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0	8. Maximum % Ash: 0.6	9. Million Btu per SCC Unit: 16.37 mmbtu/ton
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO	076	N/A	NS
PM	076	N/A	NS
VOC	076	N/A	NS

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: 40% Maximum Period of Excess Opacity Allowed: 2 min/hour Stack VE. Annual VE test. Any malfunction immediately reported.	
I. Method of Compliance: Boiler operators monitor equipment functions and stack VE. Annual VE test. Any malfunction immediately reported.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION **(Regulated Emissions Units Only)**

Supplemental Requirements

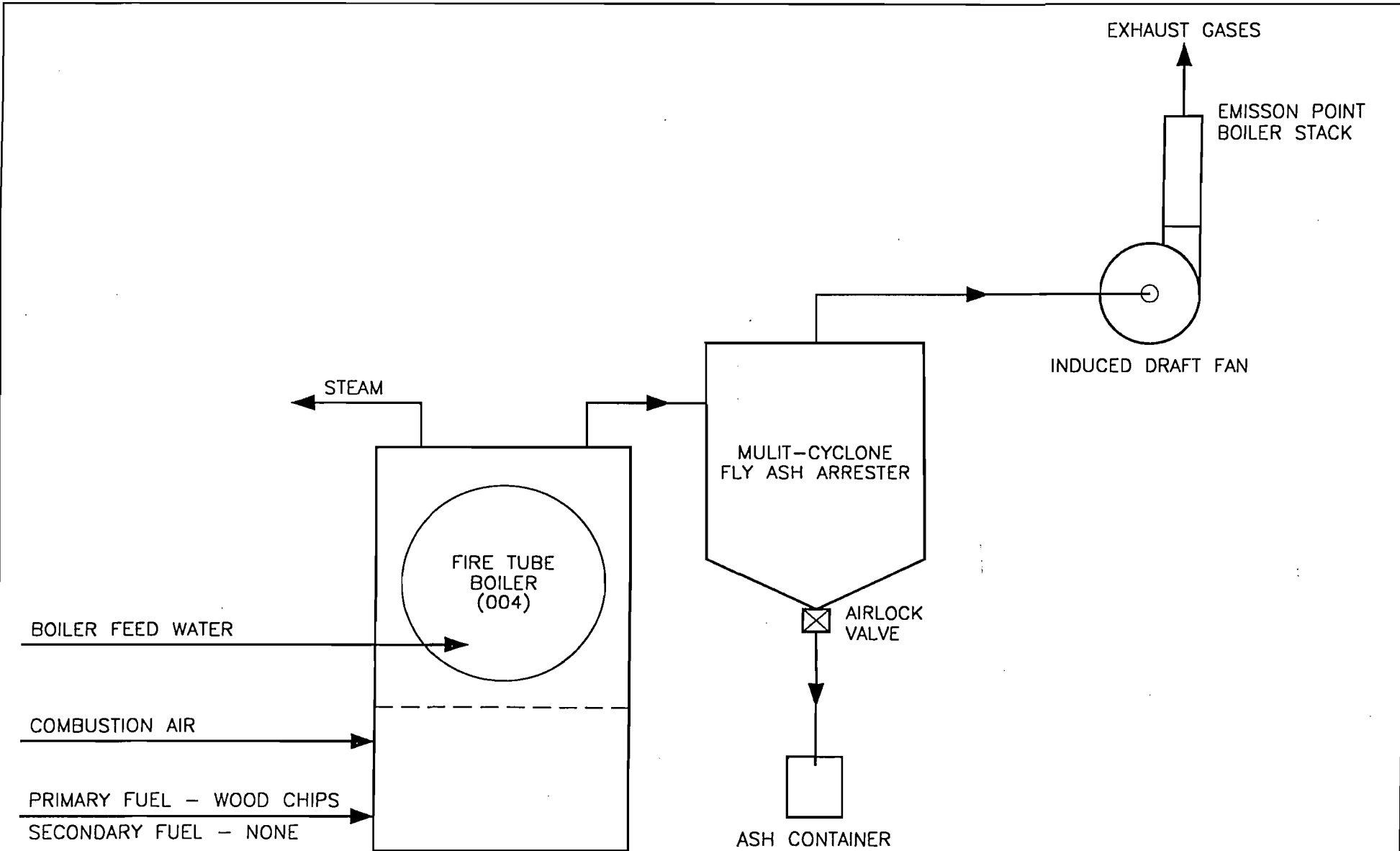
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u> 3E </u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input checked="" type="checkbox"/> Attached, Document ID: <u> 3F </u> <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: N/A

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 3E

Wood Fired Boiler Process Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3E
Palatka, Florida

Exhibit 3F

**Visible Emissions Testing for Wood Fired
Boiler at Plant No. 3**

**SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING**

FROM

**PLANT 3
FLORIDA FURNITURE INDUSTRIES
160 COMFORT ROAD
PALATKA, FLORIDA 32177**

**WOOD FIRED BOILER
DUST COLLECTORS A,B,C AND D**

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

1070026-AV

PREPARED FOR

**FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA**

PREPARED BY

**ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174**


DONNIE L. LEEPER

MAR. -08' 01 (THU) 14:06

FFI FIRST AID

TEL: 9043295455

P. 013

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
☒ Standard ☐ 203A ☐ 203B ☐ Other

Company Name
Florida Furniture Industries
 Facility Name
Plant 3
 Street Address
160 Comfort Road
 City
Palmdale State
FL Zip
32177

Process
Wood fired boiler Unit #
See Prod. data
 Control Equipment
N/A Operating Mode
N/A

Describe Emission Point
15" Circular Stack - black
in color
 Height of Emiss. Pt.
 Start ~30' End Same
 Distance to Emiss. Pt.
 Start 165' End Same
 Height of Emiss. Pt. Rel. to Observer
 Start ~30' End Same
 Direction to Emiss. Pt. (Degrees)
 Start 285° End Same

Vertical Angle to Obs. Pt.
 Start 27° End Same
 Direction to Obs. Pt. (Degrees)
 Start 285° End Same
 Distance and Direction to Observation Point from Emission Point
 Start 165' - 285° End Same

Describe Emissions
 Start Heavily End Same
 Emission Color
 Start Clear End Same
 Water Droplet Plume
 Attached ☐ Detached ☐ None ☒

Describe Plume Background
 Start SKY End Same
 Background Color
 Start grey End Same
 Wind Speed
 Start 5-10 End Same
 Ambient Temp.
 Start 65° End 65°
 Sky Conditions
 Start broken End Same
 Wind Direction
 Start 36 End Same
 Wet bulb Temp.
 Start 65° End Same

Source Layout Sketch
 Draw North Arrow
☐ TN ☒ RN
 X Observation Point
 Observer's Position
 140°
 Qn Location Line
 Longitude _____ Latitude _____ Declination _____
 Stack With Plume
 Sun ☒
 Wind ☒

VEOF1.1

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

Observation Date	Time Zone	Start Time	End Time	
<u>1-30-01</u>	<u>EST</u>	<u>1005</u>	<u>1035</u>	
Sec	0	15	30	45
Min				
1	0	0	0	0
2	0	0	0	0
3	0	0	0	0
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0
7	0	0	0	0
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29	0	0	0	0
30	0	0	0	0

Observer (Full Name)
Janice Leeper
 Observer Signature
Janice Leeper Date
1-30-01
 Organization
Ashe Environmental Services
 Certified By
E.T.A. Date
12-6-01

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

Thomas Hore

President

Michael W. Langford

Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Wood dust collecting unit at Plant No. 3 consisting of 4 bag filter units.			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 002 (renumber to 005)			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	12/85	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Wood dust originates from the wood working area. This dust is pneumatically conveyed under vacuum to the dust silo via closed loop system. Air is filtered at Bag Filter units A, B, & C. Bag Filters A & B discharge to the atmosphere while Bag Filter C air is returned to the interior of the plant. Bag Filter D separates wood chips from the wood hog chipping operation.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter A at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 5,767 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 8.72=1

Filtered Air – 50,287 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:	
Manufacturer: Pneumafil Corporation	Model Number: 13.5-448-10
2. Generator Nameplate Rating: N/A	MW
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter B at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 5,767 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 9.49:1

Filtered Air – 54,709 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: 13.5-448-10

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter C at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 5,922 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 9.15:1

Filtered Air – 54,200 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: 13.5-448-10

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter D at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 3,325 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 7.5:1

Filtered Air – 24,500 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: -

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate: 6,958 lb/hr (total all 4 units)		
4. Maximum Production Rate: N/A		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Total capacity of 6,958 lb/hr as per phone conversation with Chas Campbell of Clean Air Systems, Statesville, NC, (704) 873-9998.		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 005		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. Clean air discharge point on Bag Filter A at Plant No. 3. 2. Clean air discharge point on Bag Filter B at Plant No. 3. 3. Clean air return to plant on Bag Filter C at Plant No. 3. 4. Closed loop return line on Bag Filter D at Plant No. 3.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: Filters A & B = V Filters C & D = P	6. Stack Height: Filters A, B, & C = 26 feet Filter D = 24 feet	7. Exit Diameter: Filters A, B, & C = 3.8 feet Filter D = 3.3 feet	
8. Exit Temperature: All Filters = 77°F	9. Actual Volumetric Flow Rate: Filter A = 50,287 Filter B = 54,709 acfm Filter C = 54,200 acfm Filter D = 24,500 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.4 North (km): 3283.4			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC):		3. SCC Units: tons burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: mmbtu/ton
10. Segment Comment (limit to 200 characters): 		

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM 10	101	0	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: PM/PM10	2. Total Percent Efficiency of Control: 99.96
3. Potential Emissions: 2.78 lb/hour 12.19 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: Manufacturer's data.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): Max process rate = 6,958 lb/hr Emission Factor = 0.04% (6,958 lb/hr)(0.04%) = 2.78 lb/hr 2.78 lb/hr x 8,760 hr/yr / 2000 lb/ton = 12.19 ton/yr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: N/A% Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Testing of VE at minimum of 90% of operating rate.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

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

Supplemental Requirements

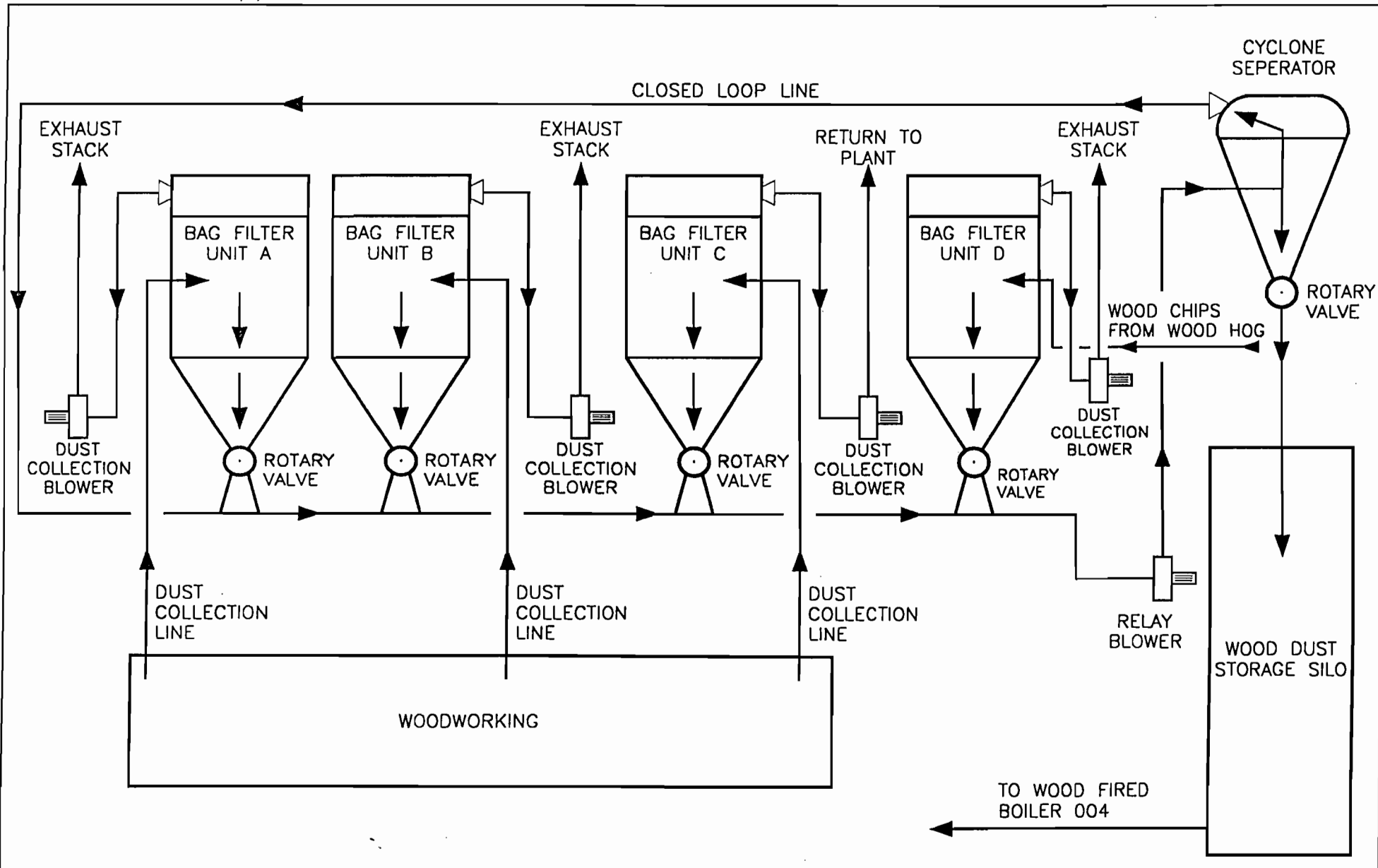
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>3D</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input checked="" type="checkbox"/> Attached, Document ID: <u>3G</u> <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: N/A

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 3D

Woodworking Dust Collection Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Woodworking Dust Collection Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3D
Palatka, Florida

Exhibit 3G

**Visible Emissions Testing for Wood Dust
Collection at Plant No. 3**

SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING

FROM

PLANT 3
FLORIDA FURNITURE INDUSTRIES
160 COMFORT ROAD
PALATKA, FLORIDA 32177

WOOD FIRED BOILER
DUST COLLECTORS A,B,C AND D

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

1070026-AV

PREPARED FOR

FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA

PREPARED BY

ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	Method 9	203A	203B	Other
--------------------------	----------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 3		
Street Address	160 Comfort Road		
City	Palatka	State	FL
Zip	32177		

Process	Dust Collector	Unit #	A	Operating Mode	See Prod. data
Control Equipment	Baghouse	Operating Mode	Continuous		

Describe Emission Point			
36" galvanized steel (circular)			
Height of Emission Pt.	Start	End	Height of Emission Pt. to Observer
Start	25'	End	Same
Distance to Emission Pt.	Start	End	Direction to Emission Pt. (Degrees)
Start	100'	End	264°

Vertical Angle to Obs. Pt.	Start	End	Direction to Obs. Pt. (Degrees)
Start	21°	End	Same
Distance and Direction to Observation Point from Emission Point	Start	End	Direction
Start	100' - 264°	End	Same

Describe Emissions			
Start	Clear	End	Same
Emission Color	Start	End	Water Droplet Plume
Start	Clear	End	Same
Attached	<input type="checkbox"/>	Detached	<input type="checkbox"/>
None	<input checked="" type="checkbox"/>		

Describe Plume Background			
Start	sky	End	Same
Background Color	Start	End	Sky Conditions
Start	grey	End	Same
Wind Speed	Start	End	Wind Direction
Start	5-10 mph	End	Same
Ambient Temp.	Start	End	Wet Bulb Temp.
Start	65°	End	65°
Relative Humidity	Start	End	Relative Humidity
Start	65%	End	65%

Source Layout Sketch		Draw North Arrow
		<input checked="" type="checkbox"/> IN <input type="checkbox"/> OUT
25 FEET 100 FEET Side View Stack with Plume Sun Wind		25 FEET 100 FEET Side View Stack with Plume Sun Wind
Longitude	Latitude	Declination

Additional Information

Form Number		Page	1 of 1
Continued on VEO Form Number			

Observation Date	Time Zone	Start Time	End Time		
1-30-01	EST	1005	1035		
Sec	0	15	30	45	Comments
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
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21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)	Bonnie Leeper	
Observer's Signature	Bonnie Leeper	
Organization	Asted Environmental Services	
Confirmed by	EST.A.	Date 12-6-00

MAR. -08' 01 (THU) 14:07

FFI FIRST AID

TEL: 9043295455

P. 015

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One) Method 9 200A 200B Other _____

Company Name Florida Furniture Industries
 Facility Name Plant 3
 Street Address 1100 Comfort Road
 City Palatka State FL Zip 32177

Process Dust Collector Unit # B Operating Mode See And. data
 Control Equipment Baghouse Operating Mode Continuous

Describe Emission Point 36" Circular galvanized stack

Height of Emiss. Pt. Start 20' End Same Height of Emiss. Pt. Rel. to Observer Start 30' End Same
 Distance to Emiss. Pt. Start 110' End Same Direction to Emiss. Pt. (Degrees) Start 276° End Same

Vertical Angle to Obs. Pt. Start 21° End Same Direction to Obs. Pt. (Degrees) Start 276° End Same
 Distance and Direction to Observation Point from Emission Point Start 110' - 276° End Same

Describe Emissions Start Clear End Same
 Emission Color Start Clear End Same Attached ☐ Detached ☐ None ☒

Describe Plume Background Start sky End Same
 Background Color Start grey End Same Sky Conditions Start broken End Same
 Wind Speed Start 5-10 End Same Wind Direction Start SE End Same
 Ambient Temp. Start 65° End 65° Wet Bulb Temp. _____ RH Percent _____

Source Layout Sketch

Draw North Arrow ☐ N ☒ S

Observer's Position

Observation Point

Sun Location Line

Scale View

Track With Plume ☐ Sun ☒ Wind ☒

Longitude _____ Latitude _____ Declination _____

Additional Information

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

Observation Date		Time Zone		Start Time	End Time
1-30-01		EST		1005	1035
Sec Min	0	15	30	45	Comments
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print) Donnie Leeper
 Observer's Signature Donnie Leeper Date 1-30-01
 Organization Atwell Environmental Service
 Certified by F.T.A. Date 12-6

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
Visual 2004 2008 Other:

Company Name Florida Furniture Industries
 Facility Name Plant 3
 Street Address 160 Comfort Road
 City PALATKA State FL Zip 32917

Process Dust Collector Unit C Operating Mode See Prod data
 Control Equipment BAGHOUSE Operating Mode Continuous

Describe Emission Point 36" X 36" SQUARE
duct
 Height of Emiss. Pt. Start level End level Height of Emiss. Pt. Rel. to Observer Start level End same
 Distance to Emiss. Pt. Start 50' End same Direction to Emiss. Pt. (Degrees) Start 270° End same

Vertical Angle to Obs. Pt. Start level End level Direction to Obs. Pt. (Degrees) Start 270° End same
 Distance and Direction to Observation Point from Emission Point Start 50' - 270° End same

Describe Emissions Start Clear End Same
 Emission Color Start Clear End Same Water Droplet Puffs Attached ☐ Detached ☐ None ☒

Describe Plume Background Start SKY End Same
 Background Color Start grey End Same Sky Conditions Start broken End Same
 Wind Speed Start 5-10 End Same Wind Direction Start Var. At times End Same
 Ambient Temp. Start End Wet Bulb Temp. RH Percent

Source Layout Sketch

Draw North Arrow ☐ IN ☒ DOWN

Observer's Position

Longtitude Latitude Direction

Additional Information

Form Number Page 1 of 1
 Continued on VEO Form Number

Observation Date		Time Zone		Start Time	End Time	
F-30-01		EST		1040	1110	
Min	Sec	0	15	30	45	Comments
1		0	0	0	0	
2		0	0	0	0	
3		0	0	0	0	
4		0	0	0	0	
5		0	0	0	0	
6		0	0	0	0	
7		0	0	0	0	
8		0	0	0	0	
9		0	0	0	0	
10		0	0	0	0	
11		0	0	0	0	
12		0	0	0	0	
13		0	0	0	0	
14		0	0	0	0	
15		0	0	0	0	
16		0	0	0	0	
17		0	0	0	0	
18		0	0	0	0	
19		0	0	0	0	
20		0	0	0	0	
21		0	0	0	0	
22		0	0	0	0	
23		0	0	0	0	
24		0	0	0	0	
25		0	0	0	0	
26		0	0	0	0	
27		0	0	0	0	
28		0	0	0	0	
29		0	0	0	0	
30		0	0	0	0	

Observer's Name (Print) Dannie Leaper
 Observer's Signature Dannie Leaper Date 1-30-01
 Organization Astech Environmental Services
 Certified By E.T.A. Date 12-26-00

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method (Use circle One)	2034	2036	Other
Method 2			

Company Name	Florida Furniture Industries		
Facility Name	Plant 3		
Street Address	160 Comfort Road		
City	PALESTINE	State	FL
		Zip	32177

Process	Dust Collector	Unit	D	Operating Mode	See Prod. data
Control Equipment	BAGHOUSE			Operating Mode	Continuous

Describe Emission Point		36" K 36" duct on Side of BAGHOUSE	
Height of Emiss. Pt.	Start 235' End Same	Height of Emiss. Pt. Rel. to Observer	Start Level End Same
Distance to Emiss. Pt.	Start 75' End Same	Direction to Emiss. Pt. (Degrees)	Start 280° End Same

Vertical Angle to Obs. Pt.	Start Level End Same	Direction to Obs. Pt. (Degrees)	Start 280° End Same
Distance and Direction to Observation Point from Emission Point		Start 75' - 280° End Same	

Describe Emissions		Start Clear End Same	
Emission Color	Start Clear End Same	Water Droplet Plume	Attached <input type="checkbox"/> Detached <input type="checkbox"/> None <input checked="" type="checkbox"/>

Describe Plume Background		Start Sky End Same	
Background Color	Start Gray End Same	Sky Conditions	Start Broken End Same
Wind Speed	Start 5-10 End Same	Wind Direction	Start Unstable End Same
Ambient Temp.	Start	Wet Bulb Temp.	Start
	End	RH Percent	Start

Source Layout Sketch		Draw North Arrow	
		<input type="checkbox"/> IN <input checked="" type="checkbox"/> DOWN 	
Longitude	Latitude	Declination	

Additional Information

VEOF1.1

Form Number		Page	1	of	1
Continued on VEO Form Number					

Observing Date	1-30-01	Time Zone	EST	Start Time	1040	End Time	1110
Sec	0	15	30	45	Comments		
Min							
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
17	0	0	0	0			
18	0	0	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print)	Bonnie Leeper	
Observer's Signature		Date
Organization	Atch Environmental Services	
Checked by		Date

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9
and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not
exceed 7.5% opacity and no single error exceeding
15% opacity was incurred during the certification test
conducted by Eastern Technical Associates of Raleigh,
North Carolina. This certificate is valid for six months
from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

Thomas Hore

President

Michael W. Langford

Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Finish coating operation at Plant No. 3.			
4. Emissions Unit Identification Number: <input type="checkbox"/> No ID ID: 003 (to be renumbered to 006) <input type="checkbox"/> ID Unknown			
5. Emissions Unit Status Code: A	6. Initial Startup Date: 12/85	7. Emissions Unit Major Group SIC Code: 2511	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters) Wood parts are coated in spray booths using air, airless, air assisted or HVLP spray where possible. Also, print coating, dip coating and hand pad staining takes place. Finished product is dried in steam heated ovens in the Finishing Room.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
 1. Paper mesh with polyester backing filter on spray booths with 98.5 – 99.5% efficiency.
 2. Waterborne coatings used in staining, print coating, dip coating and spray coating where possible.

Emissions Unit Details

- | | |
|---|-------------------|
| 1. Package Unit: | |
| Manufacturer: George Bee Finishing System | Model Number: N/A |
| 2. Generator Nameplate Rating: N/A | MW |
| 3. Incinerator Information: N/A | |
| Dwell Temperature: | °F |
| Dwell Time: | seconds |
| Incinerator Afterburner Temperature: | °F |

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	<u>240</u>	Furniture Units/hr
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	8 hours/day	5 days/week
	52 weeks/year	1,926.5 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<u>VOC Emissions from Finish Coating Operations</u> 1999: Plant Nos. 1 & 3 combined = 378.30 tons = 756,608.8 lbs 2000: Plant Nos. 1 & 3 combined = 364.79 tons = 729,570.3 lbs Average hours of operation for Plant Nos. 1 & 3 in 1999 = 1925 hrs Average hours of operation for Plant Nos. 1 & 3 in 2000 = 1928 hrs Average hourly emissions rate = $\frac{378.30 \text{ tons} + 364.79 \text{ tons}}{1925 \text{ hrs} + 1928 \text{ hrs}} = 0.1929 \text{ tons / yr}$ (371.55 tons/yr)(0.1929 tons/hr) = 1926 hrs/yr		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 006		2. Emission Point Type Code: 3, 4	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No VE			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: F,V	6. Stack Height: Spray Booth = 27 feet Ovens = 24 feet	7. Exit Diameter: Spray Booths 1-6 = 2.0 feet Spray Booth 7 = 2.5 feet Ovens = 1.3 feet	
8. Exit Temperature: Spray Booths = 77°F Ovens = 125°F	9. Actual Volumetric Flow Rate: (See Field 14) acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Fugitive Sources = 4 feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.4 North (km): 3283.4			
14. Emission Point Comment (limit to 200 characters): Spray Booth No. 1 – 26,000 cfm Spray Booth No. 2 – 26,000 cfm Spray Booth No. 3 – 26,000 cfm Spray Booth No. 4 – 26,000 cfm Spray Booth No. 5 – 26,000 cfm Spray Booth No. 6 – 26,000 cfm Spray Booth No. 7 – 13,500 cfm Oven No. 1 – 1,000 cfm Oven No. 2 – 1,000 cfm Oven No. 3 – 750 cfm Oven No. 4 – 750 cfm Oven No. 5 – 750 cfm			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):

N/A – Steam heat is generated by Wood Fired Boiler (004).

2. Source Classification Code (SCC): N/A

3. SCC Units: N/A
tons burned

4. Maximum Hourly Rate:
N/A

5. Maximum Annual Rate:
N/A

6. Estimated Annual Activity
Factor: N/A

7. Maximum % Sulfur:
N/A

8. Maximum % Ash:
N/A

9. Million Btu per SCC Unit:
N/A mmbtu/ton

10. Segment Comment (limit to 200 characters):

N/A

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):

2. Source Classification Code (SCC):

3. SCC Units:

4. Maximum Hourly Rate:

5. Maximum Annual Rate:

6. Estimated Annual Activity
Factor:

7. Maximum % Sulfur:

8. Maximum % Ash:

9. Million Btu per SCC Unit:

10. Segment Comment (limit to 200 characters):

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	N/A	N/A	EL
H085	N/A	N/A	NS
H096	N/A	N/A	NS
H115	N/A	N/A	NS
H120	N/A	N/A	NS
H169	N/A	N/A	NS
H186	N/A	N/A	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control: 0
3. Potential Emissions: 385.7 lb/hour 371.55 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 378.30 tons = 756,608.8 lbs 2000: Plant Nos. 1 & 3 combined = 364.79 tons = 729,570.3 lbs Average total VOC Emissions for 1999/2000 = 743,089.6 lbs = 371.55 tons Average hours of operation for 1999/2000 = 1926.5 hrs 371.55 tons / 1926.5 hrs = 0.1929 tons/hr = 385.7 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): VOC emission rates include pollutants which are listed as both VOC and HAP.	

Allowable Emissions Allowable Emissions 1 of 7

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: 8/1/01
3. Requested Allowable Emissions and Units: 371.55 tons/yr	4. Equivalent Allowable Emissions: 385.7 lb/hour 371.55 tons/year
5. Method of Compliance (limit to 60 characters): Tracking of VOC emissions using REGMET 6.0 based on chemical usage.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): N/A	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H085	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 9.386 lb/hour 9.041 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 9,783.5 lbs + 7,995.7 lbs = 17,779.2 lbs = 8.89 tons 2000: Plant Nos. 1 & 3 combined = 9,610.5 lbs + 8,775.5 lbs = 18,386.0 lbs = 9.19 tons Average H085 emissions for 1999/2000 = 18,082.6 lbs = 9.041 tons Average hours of operation for 1999/2000 = 1926.5 hrs 18,082.6 lbs / 1926.5 hrs = 9.386 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Ethol Benzene included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions:
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H096	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 5.544 lb/hour 5.341 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 6,615.0 lbs + 4,731.6 lbs = 11,346.6 lbs = 5.673 tons 2000: Plant Nos. 1 & 3 combined = 5,725.9 lbs + 4,290.2 lbs = 10,016.1 lbs = 5.008 tons Average H096 emissions for 1999/2000 = 10,681.4 lbs = 5.341 tons Average hours of operation for 1999/2000 = 1926.5 hrs 10,681.4 lbs / 1926.5 hrs = 5.544 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Glycol ethers included in VOC total.	

Allowable Emissions Allowable Emissions N/A of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H115	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.9042 lb/hour 0.7000 tons/year	4. Synthetically Limited? <input type="checkbox"/>
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 645.1 lbs + 412.3 lbs = 1,057.4 lbs = 0.5287 tons 2000: Plant Nos. 1 & 3 combined = 839.7 lbs + 902.3 lbs = 1,742.0 lbs = 0.8710 tons Average H115 emissions for 1999/2000 = 1,399.7 lbs = 0.7000 tons Average hours of operation for 1999/2000 = 1926.5 hrs 1,742.0 lbs / 1926.5 hrs = 0.9042 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Methanol included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H120	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.7266 lb/hour 0.6999 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 407.2 lbs + 431.0 lbs = 838.2 lbs = 0.4191 tons 2000: Plant Nos. 1 & 3 combined = 840.4 lbs + 1,120.8 lbs = 1,961.2 lbs = 0.9806 tons Average H120 emissions for 1999/2000 = 1,399.7 lbs = 0.6999 tons Average hours of operation for 1999/2000 = 1926.5 hrs 1,399.7 lbs / 1926.5 hrs = 0.7266 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Methyl ethyl ketone included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**(Regulated Emissions Units -****Emissions-Limited and Preconstruction Review Pollutants Only)****Potential/Fugitive Emissions** N/A

1. Pollutant Emitted: H169	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 17.69 lb/hour 17.04 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 19,686.4 lbs + 15,476.6 lbs = 35,163.0 lbs = 17.58 tons 2000: Plant Nos. 1 & 3 combined = 18,362.5 lbs + 14,616.4 lbs = 32,978.9 lbs = 16.49 tons Average H169 emissions for 1999/2000 = 34,071.0 lbs = 17.04 tons Average hours of operation for 1999/2000 = 1926.5 hrs 34,071.0 lbs / 1926.5 hrs = 17.69 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Toluene included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H186		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 40.48 lb/hour 38.99 tons/year		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 to tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 41,942.7 lbs + 34,605.1 lbs = 76,547.8 lbs = 38.27 tons 2000: Plant Nos. 1 & 3 combined = 41,351.2 lbs + 38,064.1 lbs = 79,415.3 lbs = 39.71 tons Average H186 emissions for 1999/2000 = 77,981.6 lbs = 38.99 tons Average hours of operation for 1999/2000 = 1926.5 hrs 77,981.6 lbs / 1926.5 hrs = 40.48 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Xylones included in VOC total.			

Allowable Emissions Allowable Emissions N/A of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation N/A of _____

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

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of

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

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

Supplemental Requirements

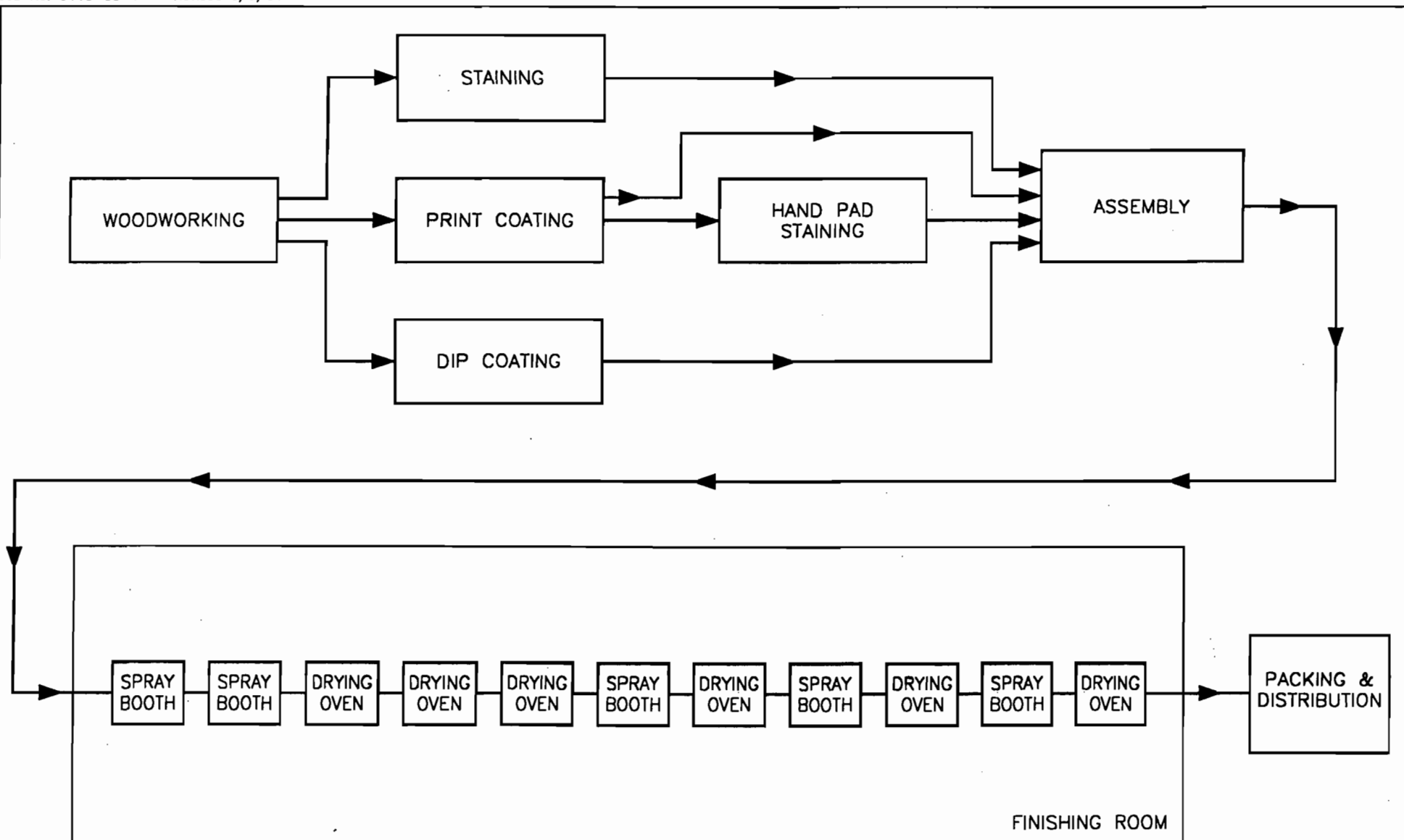
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>3H</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 3H

Finish Coating Operations Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Finish Coating Operations Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3H
Palatka, Florida

MITTAUER & ASSOCIATES, INC.

CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32003

Tel: (904) 278-0030

Fax: (904) 278-0840

LETTER OF TRANSMITTAL

RECEIVED

APR 04 2001

BUREAU OF AIR REGULATION**TO:** John Reynolds, P.E.

Bureau of Air Regulation - FDEP

Twin Towers Building

2600 Blair Stone Road

Tallahassee, FL 32399-2400

DATE: 4-3-01**PROJECT No.:** 9110-08-1**RE:** Air Permitting

Consolidation of Plant Nos. 1 & 3

Florida Furniture Industries, Inc

WE ARE SENDING YOU: ☒ Attached ☐ Under Separate Cover Via _____, the following items:☐ Plans/Prints ☐ Specifications ☐ Originals ☐ Computer Disk ☐ _____

COPIES	DATE	NO.	DESCRIPTION
2	3-14-01		FDEP Application for Air Permit - Title V Source (signed and sealed)

THESE ITEMS ARE TRANSMITTED as checked below:

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

REMARKS: Pursuant to your request, enclosed are two additional copies of an FDEP Application for Air Permit - Title V Source with regard to the Consolidation of Plant Nos. 1 and 3 for Florida Furniture Industries, Inc. Contact me if you have any questions.

COPY TO: _____

SIGNED: _____

Timothy P. Norman, P.E.

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

File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

May 21, 1998

Ref: 8P2-A

Lynn Menlove, Manager
New Source Review Section
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Re: Response to Request for Guidance in
Defining Adjacent with Respect to Source
Aggregation

Dear Mr. Menlove:

This is in response to your letter of January 15, 1998, to Mike Owens of my staff, requesting guidance and/or specific recommendations in the matter of Utility Trailer Manufacturing Company. For the purpose of determining if two Utility Trailer facilities should or should not be aggregated into a single source under Clean Air Act Title V and New Source Review permitting programs, you asked what is the specific physical distance associated with the definition of "adjacent." The word "adjacent" is part of the definition of "source" in the Utah SIP regulations, at R307-1-1. The SIP definition follows the Federal definition found in 40 CFR 51.166.

In brief, our answer is that the distance associated with "adjacent" must be considered on a case-by-case basis. This is explained in the preamble to the August 7, 1980 PSD rules, which says "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." After searching the New Source Review Guidance Notebook, and after querying the other Regions and EPA's Office of Air Quality Planning and Standards, we have found no evidence that any EPA office has ever attempted to indicate a specific distance for "adjacent" on anything other than a case-by-case basis. We could not find any previous EPA determination for any case that is precisely like Utility Trailer, i.e., two facilities under common control, with the same primary 2-digit SIC code, located about a mile apart, both producing very similar products, but claimed by the company to be independent production lines.

Utah SIP regulations do not define "adjacent." The definition in the 1995 edition of Webster's New College Dictionary is: 1. Close to; nearby, or 2. Next to; adjoining. We realize this leaves considerable gray area for interpretation; however, since the term "adjacent" appears in the Utah SIP as part of the definition of "source," any evaluation of what is "adjacent" must relate to the guiding principle of a common sense notion of "source." (The phrase "common

sense notion" appears on page 52695 of the August 7, 1980 PSD preamble, with regard to how to define "source.") Hence, a determination of "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." Below are some types of questions that might be posed in this evaluation, as it pertains to Utility Trailer. Not all the answers to these questions need be positive for two facilities to be considered adjacent.

- Was the location of the new facility chosen primarily because of its proximity to the existing facility, to enable the operation of the two facilities to be integrated? In other words, if the two facilities were sited much further apart, would that significantly affect the degree to which they may be dependent on each other?
- Will materials be routinely transferred between the facilities? Supporting evidence for this could include a physical link or transportation link between the facilities, such as a pipeline, railway, special-purpose or public road, channel or conduit.
- Will managers or other workers frequently shuttle back and forth to be involved actively in both facilities? Besides production line staff, this might include maintenance and repair crews, or security or administrative personnel.
- 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?

One illustration of this type of evaluation involved Great Salt Lake Minerals in Utah, which we wrote to you about on August 8, 1997, in response to your inquiry. (See enclosure #1.) We recommended, as EPA guidance, that you treat the two GSLM facilities as a single source (i.e., "adjacent"), despite the fact that they are a considerable distance apart (21.5 miles). We based that advice on the functional inter-relationship of the facilities, evidenced in part by a dedicated channel between them. We wrote that the lengthy distance between the facilities "is not an overriding factor that would prevent them from being considered a single source."

Another illustration is ESCO Corporation in Portland, Oregon, which operates two metal casting foundries (a "Main Plant" and a "Plant 3"), a couple of blocks apart. All castings produced by foundries at both facilities are coated, packaged and shipped at the "Main Plant". EPA Region 10 wrote to the State of Oregon on August 7, 1997 (see enclosure #2), that the guiding principle in evaluating whether the two facilities are "adjacent" is "the common sense notion of a plant. That is, pollutant emitting activities that comprise or support the primary product or activity of a company or operation must be considered part of the same stationary source." EPA determined that the two ESCO facilities must be considered a single major stationary source, since they function together in that manner, even though the Plant 3 foundry operates independently from the Main Plant foundry.

Another illustration is Anheuser-Busch in Fort Collins, Colorado, which operates a brewery and landfarm about six miles apart. A memo from OAQPS to our Regional Office, dated August 27, 1996 (see enclosure #3), stated that with regard to "contiguous or adjacent," the facilities should be treated as one source, due to their functional inter-relationship (landfarm as an integral part of the brewery operations), evidenced in part by a disposal pipeline between them. The fact that they are a considerable distance apart "does not support a PSD determination that the brewery proper and the landfarm constitute separate sources for PSD purposes."

Another illustration is Acme Steel Company, which operates an integrated steel mill consisting of coke ovens and blast furnaces at a site in Chicago, Illinois, along with basic oxygen furnaces, casting and hot strip mill operations at a site in Riverdale, Illinois, about 3.7 miles away. The blast furnace in Chicago produces hot metal that is transported via commercial rail to the BOF shop in Riverdale for further processing into steel. EPA Region 5 wrote to the State of Illinois on March 13, 1998 (see enclosure #4), that "Although the two sites are separated by Lake Calumet, landfills, I-94, and the Little Calumet River, USEPA considers that the close proximity of the sites, along with the interdependency of the operations and their historical operation as one source, as sufficient reasons to group these two facilities as one."

Therefore, in the matter of Utility Trailer, we recommend you evaluate, using questions such as those we posed above, whether the two facilities (one existing and one proposed for construction) will, in fact, operate independently of each other, as the company has claimed. Although Utility Trailer writes that "The present facility is not capable of conversion to the new trailer manufacturing process," they also write that the existing facility is "an inefficient manufacturing process which has made this facility less cost-competitive." This suggests to us the possibility that the existing facility could become a support facility for the new one. The company should be advised that if the two facilities are later discovered by the State and/or EPA to be actually operating as a single major source, and no Title V or PSD permit applications have been submitted where required by regulation, the company could become subject to State or EPA enforcement action or citizen suit.

Finally, please be aware that if the facilities are treated as two separate sources, no emission netting between them can be allowed, to avoid major source NSR permitting at either facility, in the event of future facility modifications.

We hope this letter will be helpful. It has been written only as guidance, as it remains the State's responsibility to make source aggregation determinations under EPA-approved State programs and regulations. This letter has been reviewed by specialists at OAQPS, by our Office of Regional Counsel, and by Office of General Counsel at EPA Headquarters. We apologize for the delay in getting our response to you.

If you have questions, please contact Mike Owens. He is at at (206) 553-6511 until late June, after which he may be reached at (303) 312-6440.

Sincerely,

Richard R. Long
Director
Air Program

Enclosures (4)

cc: Rick Sprott, Utah DAQ
Scott Manzano, Utah DAQ
Jose Garcia, Utah DAQ



4611-4 U.S. Highway 17
Orange Park, Florida 32003
Office: (904) 278-0030
Fax: (904) 278-0840

RECEIVED

APR 04 2001

March 14, 2001

BUREAU OF AIR REGULATION

A. A. Linero, P.E., Administrator
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Submittal of Permit Application
Air Permitting
Florida Furniture Industries
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Linero:

Florida Furniture Industries, Inc. (FFI) operates two wood furniture manufacturing plants in Putnam County, Plant No. 1 (Permit No. 1070002-002-AV) and Plant No. 3 (Permit No. 1070026-002-AV). The permit for Plant No. 1 expires May 13, 2003 while the permit for Plant No. 3 expires July 22, 2003. These plants are regulated for particulates, HAPs, and VOCs.

Florida Furniture plans to close down the painting operations at the Plant No. 1 site and shift all painting operations to the Plant No. 3 site on March 19, 2001 in order to improve the efficiency of their operations and reduce operating costs. No new facilities will be constructed at the Plant No. 3 site. Only the number of personnel and/or hours of operation will increase. All finish coating operations at the Plant No. 1 site will be terminated. There will be no net increase in VOC emissions from the two plants above the total annual average of 374.49 tons/yr for 1999 and 2000.

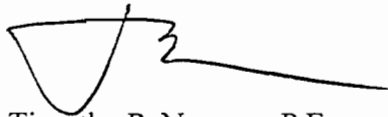
The dry kilns, boiler, and woodworking operations would continue at the Plant No. 1 site as currently permitted. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc. The boiler and woodworking operations at Plant No. 3 would remain essentially unchanged from their current permitted status.

A.A. Linero, P.E.
March 14, 2001
Page 2

Enclosed are two (2) copies of DEP Application Form 62-210.900(1) "Application for Air Permit - Title V Source" which reflect consolidating the finish coating operation at the Plant No. 3 site. It is our understanding that there will be no permit fees associated with this application.

Contact me if you have any questions or require additional information.

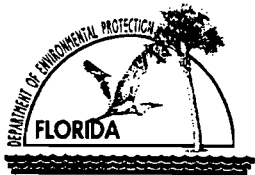
Sincerely,
Mittauer & Associates, Inc.

A handwritten signature in black ink, appearing to read "Timothy P. Norman". The signature is stylized, with a large, sweeping initial "T" and a long, horizontal stroke extending to the right.

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

TPN/bb

cc: Florida Furniture



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Florida Furniture Industries, Inc.	
2. Site Name: Plant No. 1 and Plant No. 3	
3. Facility Identification Number: 1070002 and 1070026 [] Unknown	
4. Facility Location: Street Address or Other Locator: 722 River Street (Plant No. 1) and 160 Comfort Road (Plant No. 3) City: Palatka County: Putnam Zip Code: 32177	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Timothy P. Norman, P.E., Manager of Environmental Services	
2. Application Contact Mailing Address: Organization/Firm: Mittauer & Associates, Inc. Street Address: 4611-4 U.S. Highway 17 City: Orange Park State: FL Zip Code: 32003	
3. Application Contact Telephone Numbers: Telephone: (904) 278-0030 Fax: (904) 278-0840	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

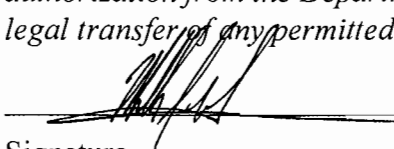
- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.
- Current construction permit number: _____
- ☒ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.
- Current construction permit number: N/A
- Operation permit number to be revised: 1070002-002-AV, 1070026-002-AV
- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)
- Operation permit number to be revised/corrected: _____
- ☐ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.
- Operation permit number to be revised: _____
- Reason for revision: _____

Air Construction Permit Application N/A

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: William A. Cratch, VP Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Furniture Industries, Inc. Street Address: P.O. Box 610 City: Palatka State: FL Zip Code: 32178
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (904) 328-3444 Fax: (904) 329-5455
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> <div style="display: flex; justify-content: space-between;"><div>Signature </div><div>Date <u>03/19/01</u></div></div>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Timothy P. Norman, P.E. Registration Number: 41128
2. Professional Engineer Mailing Address: Organization/Firm: Mittauer & Associates, Inc. Street Address: 4611-4 U.S. Highway 17 City: Orange Park State: Florida Zip Code: 32003
3. Professional Engineer Telephone Numbers: Telephone: (904) 278-0030 Fax: (904) 278-0840

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

(seal)

Date

3/14/01

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Wood Fired Boiler at Plant No. 1	N/A	0
002	Dry Kiln Nos. 3 & 4 at Plant No. 1	N/A	0
003	Woodworking Dust Collection Plant No. 1	N/A	0
004 (001)*	Wood Fired Boiler at Plant No. 3	N/A	0
005 (002) *	Woodworking Dust Collection at Plant No. 3	N/A	0
006 (003) *	Finish Coating Operation at Plant No. 3	N/A	0
	* Number in parenthesis represents current emissions ID # for Plant No. 3		

Application Processing Fee

Check one: [] Attached - Amount: \$ _____ [X] Not Applicable.

Construction/Modification Information**1. Description of Proposed Project or Alterations:**

Project will involve consolidating all finish coating operations at Plant No. 3. Finish coating operations will no longer be performed at Plant No. 1. No new facilities will be constructed at Plant No. 3, only the number of personnel and/or hours of operation will increase at Plant No. 3. There will be no net increase in VOC emissions between the two plants. The increase in VOC emissions at Plant No. 3 will be offset by the decrease in VOC emissions at Plant No. 1.

2. Projected or Actual Date of Commencement of Construction: Plant No. 1 began operation in 1934. Plant No. 3 was constructed in 1985.

3. Projected Date of Completion of Construction: N/A

Application Comment

N/A

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates:			
Zone: 17		East (km): 438.3	North (km): 3278.9 (Plant No. 1)
Zone: 17		East (km): 436.4	North (km): 3283.4 (Plant No. 3)
2. Facility Latitude/Longitude:			
Latitude (DD/MM/SS): 29°-38'-25" N		Longitude (DD/MM/SS): 81°-38'- 5" W (Plant No. 1)	
Latitude (DD/MM/SS): 29°-40'-50" N		Longitude (DD/MM/SS): 81°-39'- 25"W (Plant No. 3)	
3. Governmental Facility Code:	4. Facility Status Code:	5. Facility Major Group SIC Code:	6. Facility SIC(s):
0	A	25	2511
7. Facility Comment (limit to 500 characters):			
Florida Furniture Industries, Inc. manufacturers wood bedroom furniture.			

Facility Contact

1. Name and Title of Facility Contact:		
Kenneth G. Loyless, Safety Director		
2. Facility Contact Mailing Address: P.O. Box 610		
Organization/Firm: Florida Furniture Industries, Inc.		
Street Address: 722 River Street (Plant No. 1); 160 Comfort Road (Plant No. 3)		
City: Palatka	State: FL	Zip Code: 32178
3. Facility Contact Telephone Numbers:		
Telephone: (904) 328-3444		Fax: (904) 328-5455

Facility Regulatory Classifications**Check all that apply:**

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input checked="" type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): Hours of operation of the finish coating operations are restricted to <u>1926.5</u> hours/year to maintain total VOC emissions to less than <u>371.55</u> TPY.	

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.

62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions
62-213.205 F.A.C: Annual Emissions Fee	CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS,
62-213.400 F.A.C: Permits and Permit Revisions Required.	62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-213.410 F.A.C: Changes without Permit Revision	62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.
62-213.420 F.A.C: Permit Applications	62-296.410, F.A.C.: Carbonaceous Fuel , Burning Equipment.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
CO	B				
PM	B				
PM10	B				
VOC	A	-	374.49	OTHER	001, 002, 004, 006
H020	B				
H046	B				
H047	B				
H053	B				
H060	B				
H085	B				
H095	B				
H096	B				
H113	B				
H115	B				
H120	B				
H123	B				
H132	B				
H169	A				
H182	B				
H186	A				

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: <u>1A3A</u> [] Not Applicable [] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: <u>1B & 3B</u> [] Not Applicable [] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: <u>1C & 3C</u> [] Not Applicable [] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [X] Attached, Document ID: <u>1D & 3D</u> [] Not Applicable [] Waiver Requested <u>1E & 3E</u>
5. Fugitive Emissions Identification: [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
6. Supplemental Information for Construction Permit Application: [] Attached, Document ID: _____ [X] Not Applicable
7. Supplemental Requirements Comment: N/A

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBITS 1A 3A

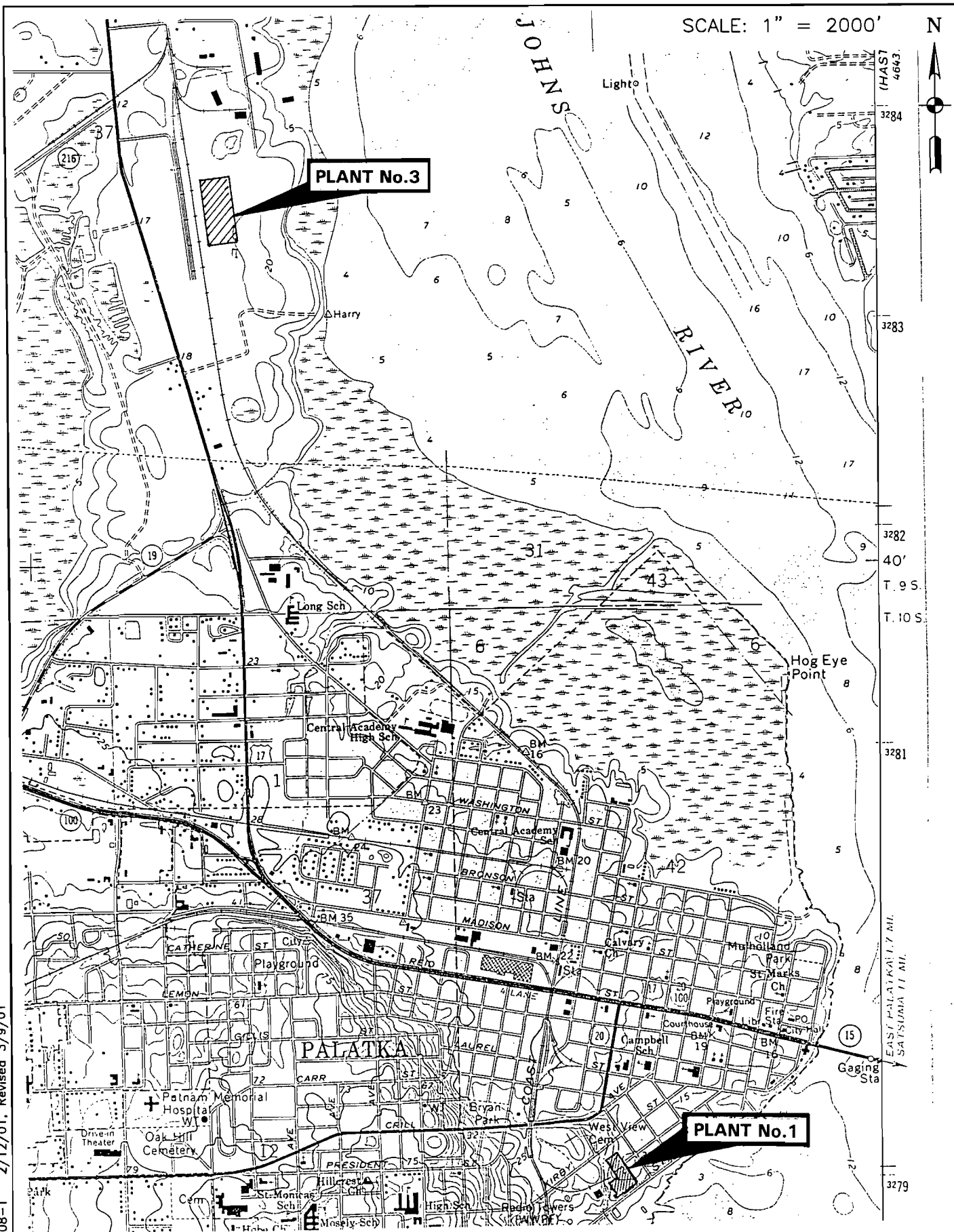
1B, 3B

1C, 3C

1D, 3D

1E, 3E

Job No. 9110-08-1 2/12/01, Revised 3/9/01



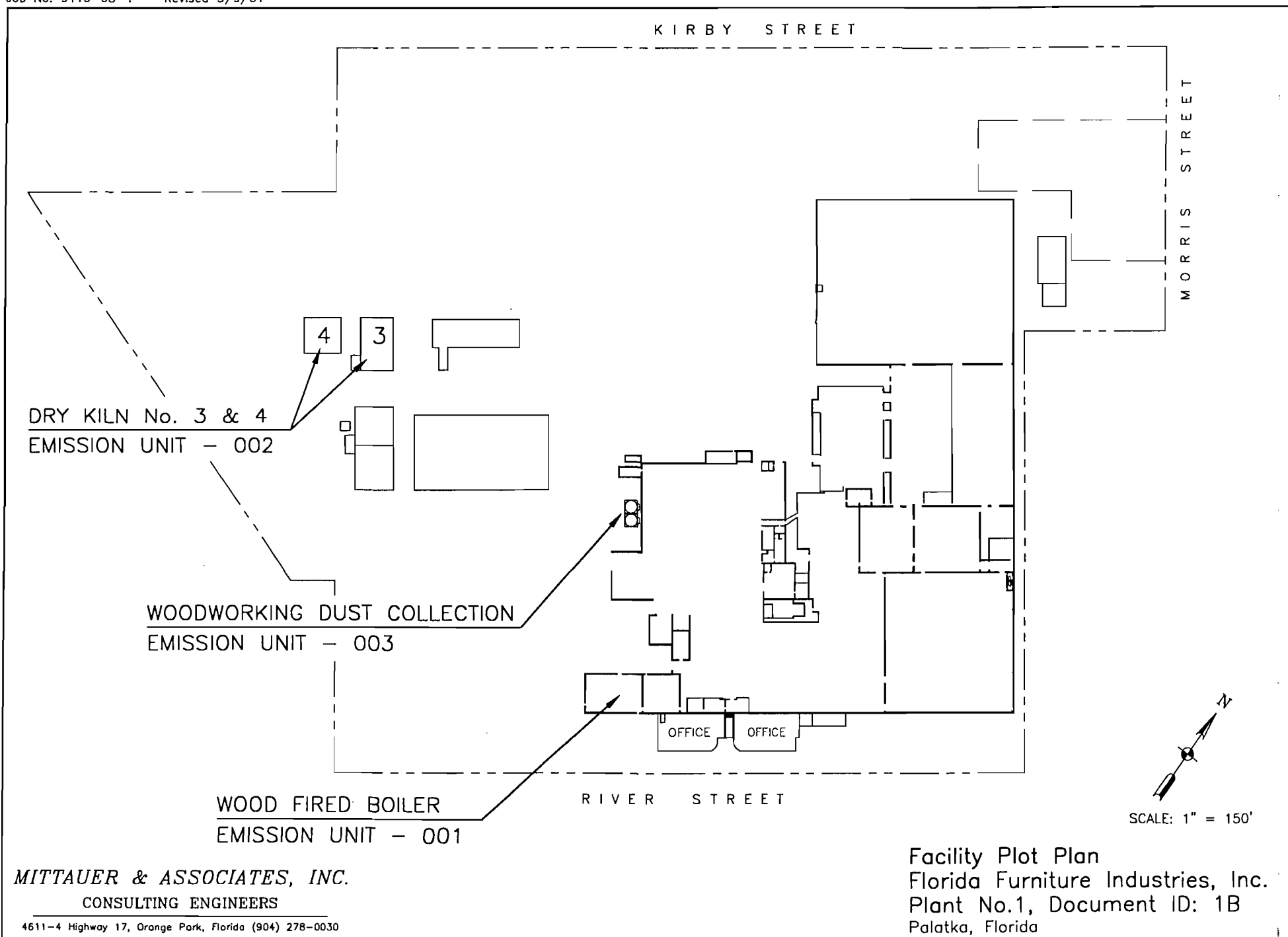
SCALE: 1" = 2000'



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4611-4 Highway 17, Orange Park, Florida (904) 278-0030

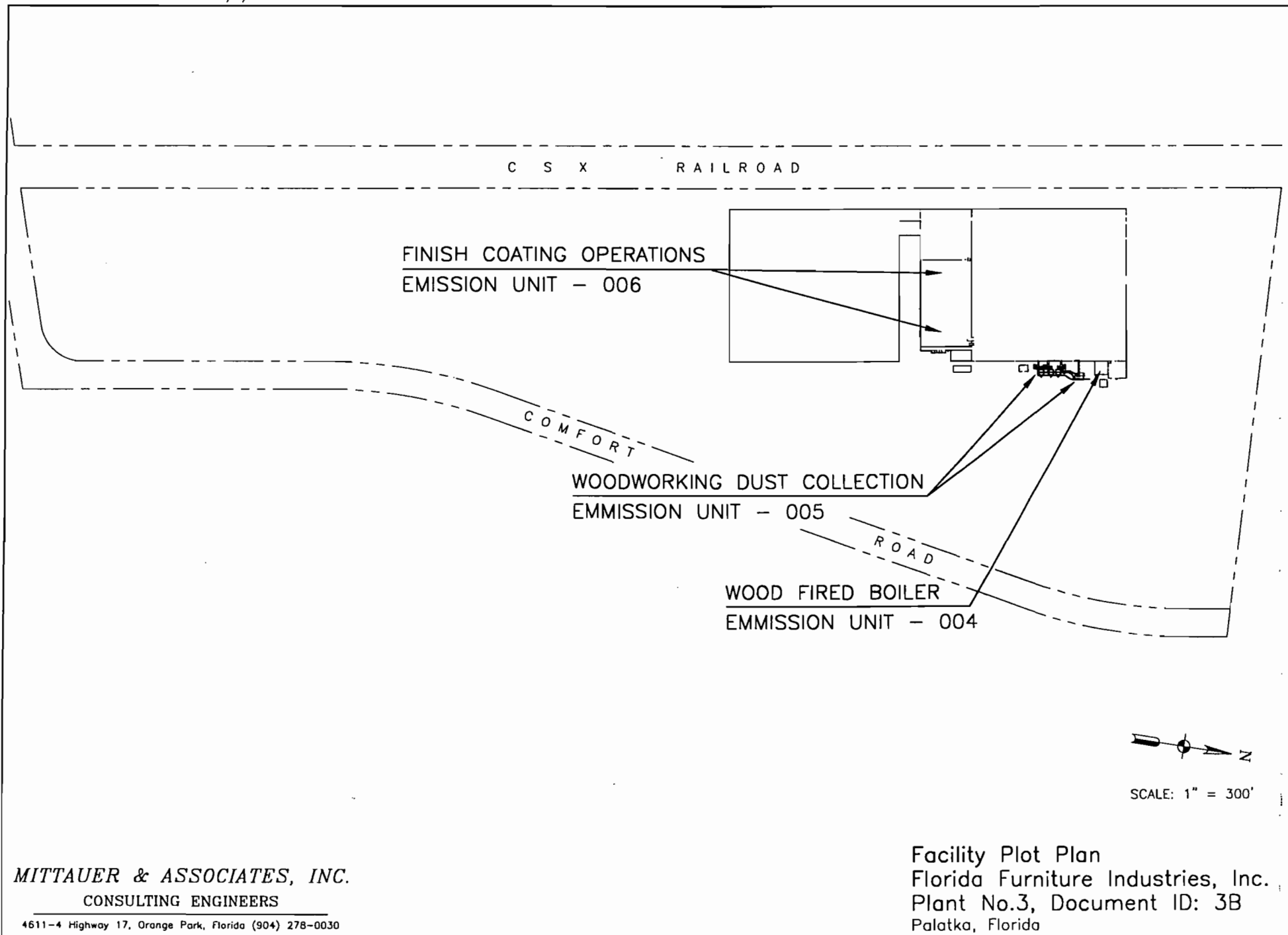
FLORIDA FURNITURE INDUSTRIES, INC.
Air Permitting
Facility Location Map, Document ID: 1A 3A
Putnam County, Florida



MITTAUER & ASSOCIATES, INC.

CONSULTING ENGINEERS

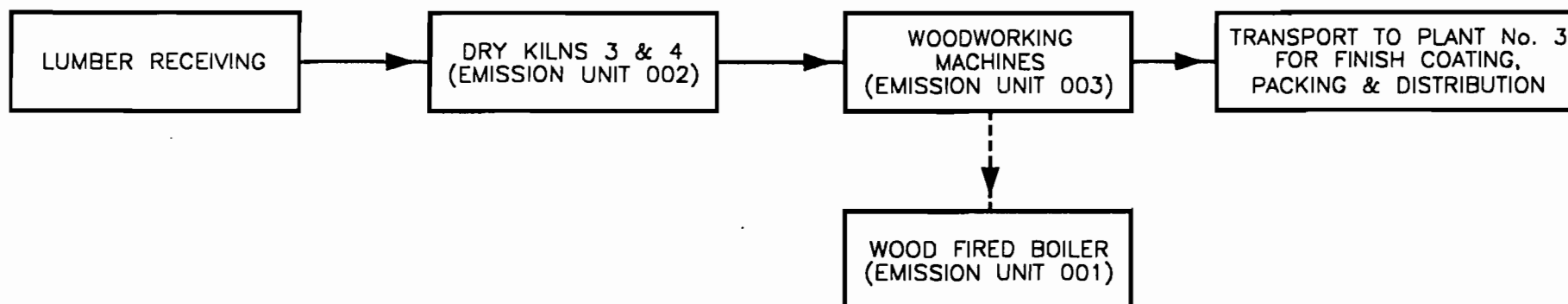
4611-4 Highway 17, Orange Park, Florida (904) 278-0030



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4611-4 Highway 17, Orange Park, Florida (904) 278-0030

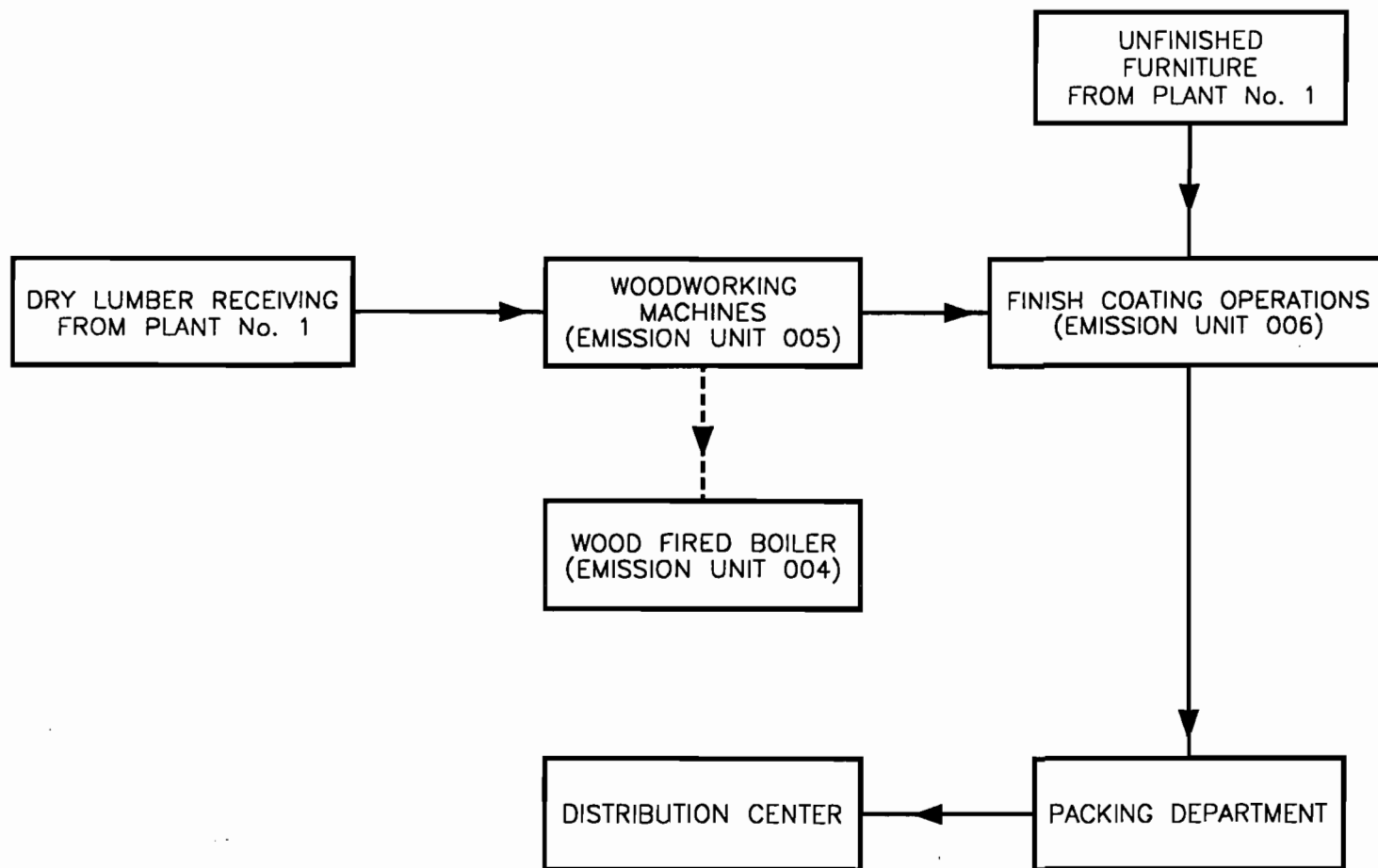
Facility Plot Plan
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3B
Palatka, Florida



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4611-4 Highway 17, Orange Park, Florida (904) 278-0030

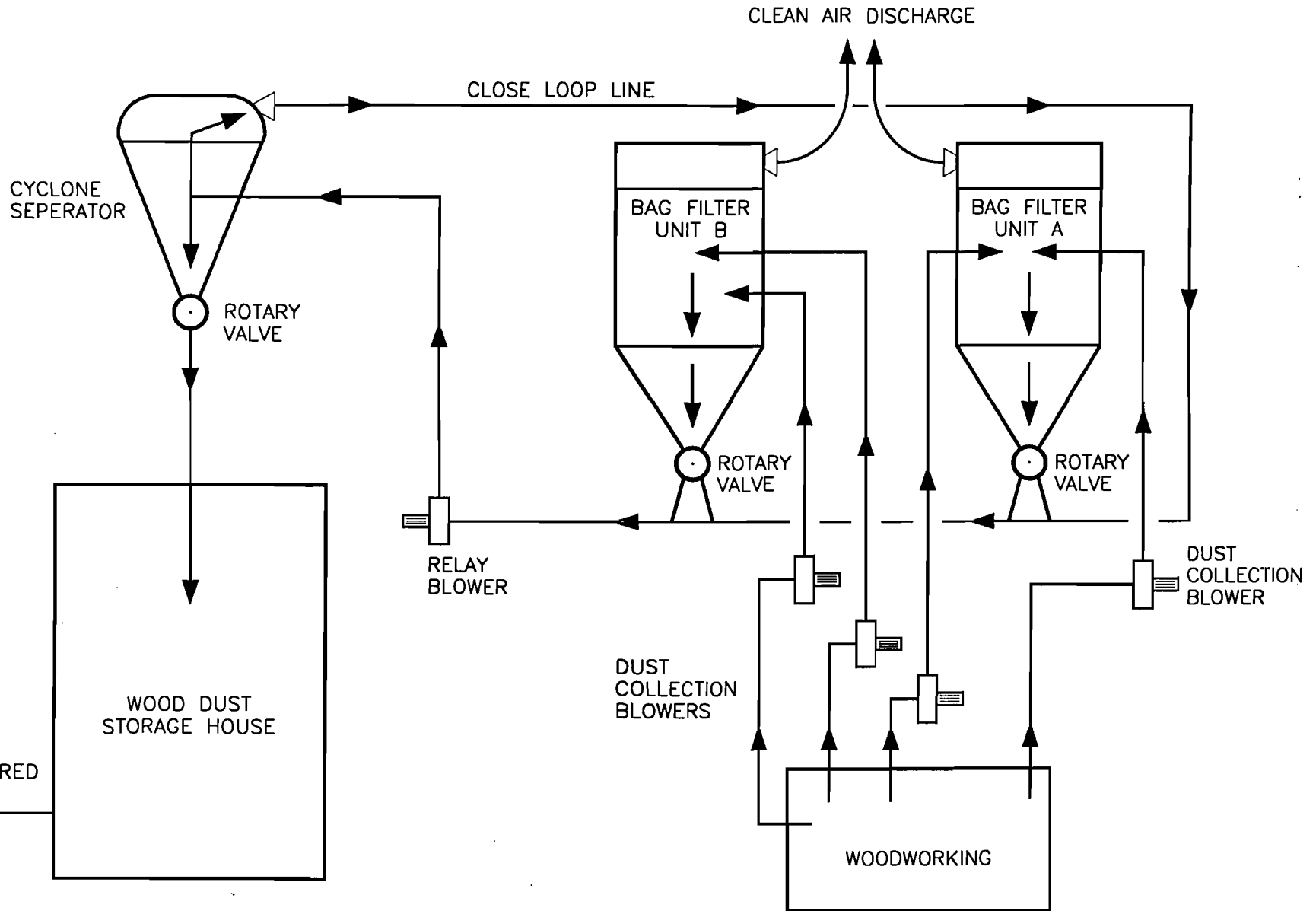
Facility Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1C
Palatka, Florida



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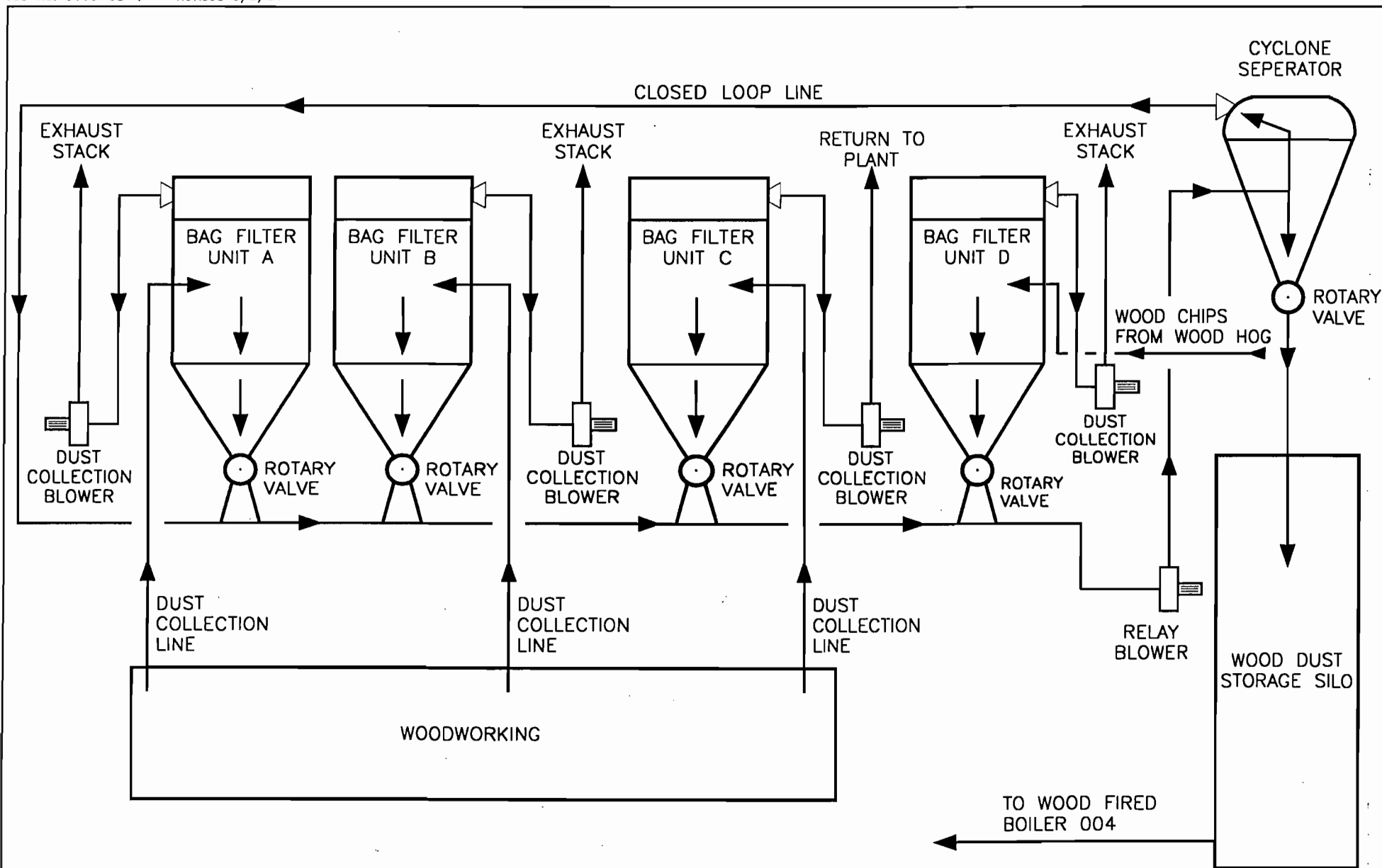
Facility Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3C
Palatka, Florida



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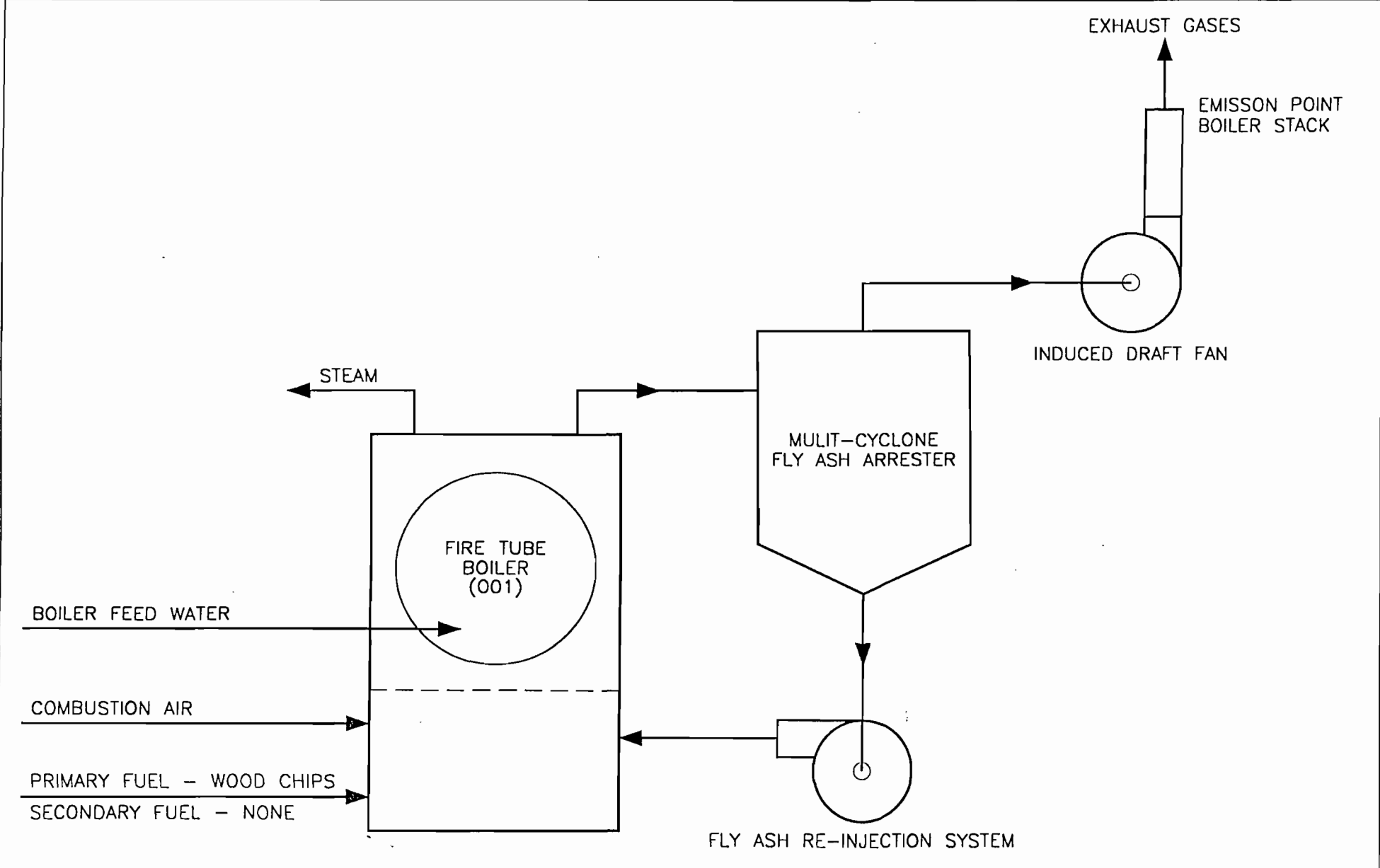
Woodworking Dust Collection Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1D
Palatka, Florida



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CONSULTING ENGINEERS

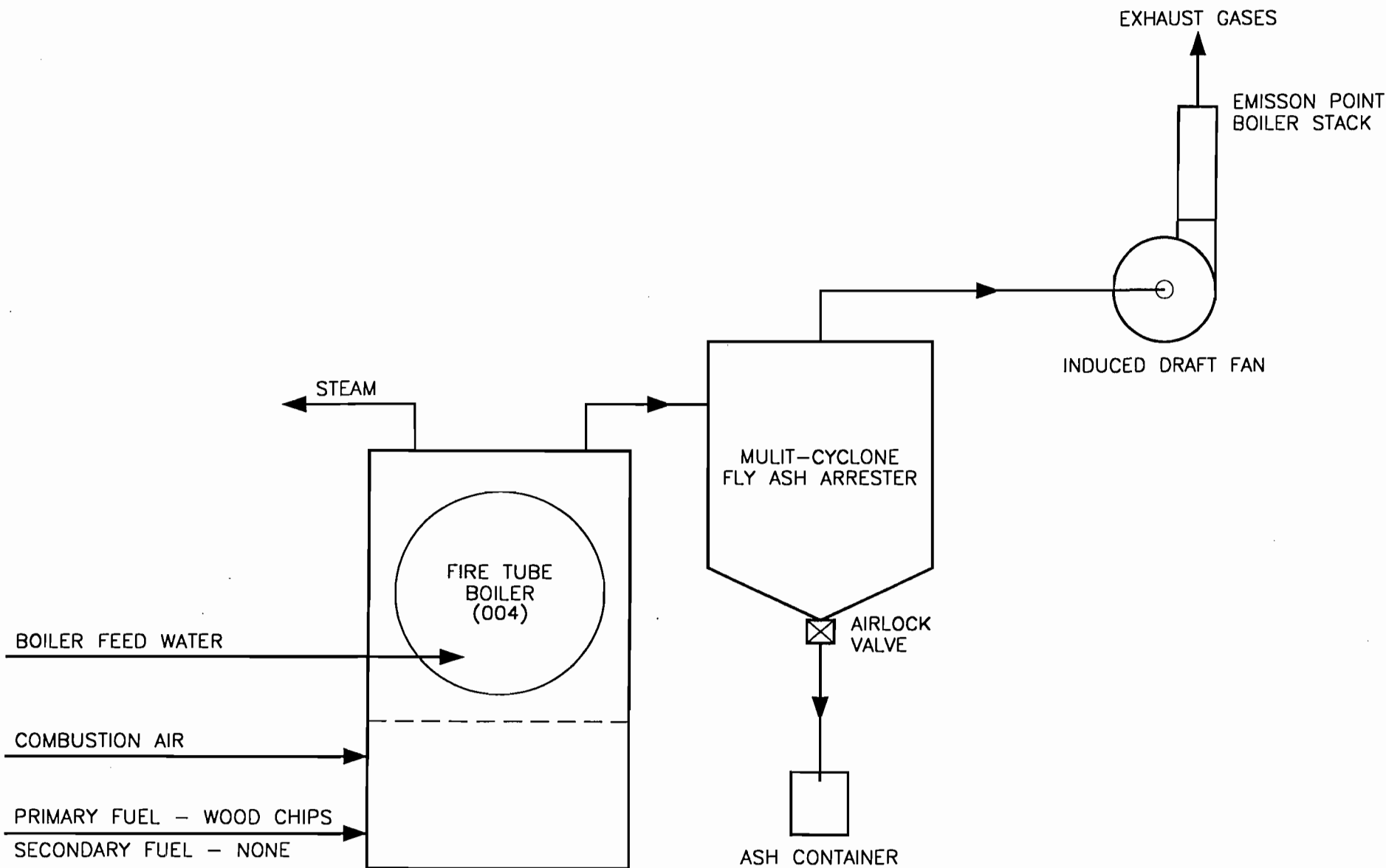
4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Woodworking Dust Collection Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3D
Palatka, Florida



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3E
Palatka, Florida

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Wood fired boiler at Plant No. 1			
4. Emissions Unit Identification Number:			
ID: 001		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	1963	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Boiler provides steam to Plant No. 1 for heating of dry kilns and for heating of the manufacturing facility.			

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	18.24	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	1,960 lb/hr	23.52 ton/day
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Throughput based on current permitted rate.		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 001		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Boiler stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 50 feet	7. Exit Diameter: 3.2 feet	
8. Exit Temperature: 491 °F	9. Actual Volumetric Flow Rate: 6.600 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3278.9			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC): 1-02-009-06		3. SCC Units: Tons burned
4. Maximum Hourly Rate: 0.98 tons/hr	5. Maximum Annual Rate: 8,585 tons/yr	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0	8. Maximum % Ash: 1.2	9. Million Btu per SCC Unit: 18.61
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment _____ of _____ N/A

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

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

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 7.47 lb/hour 32.70 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 100% Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): $\frac{13.6 \text{ lbs / ton} \times 4,809.24 \text{ tons / yr}}{2000 \text{ lbs / ton}} = 32.70 \text{ tons / yr} = 7.47 \text{ lbs / hr}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 40% Maximum Period of Excess Opacity Allowed: 2 min/hour	
4. Method of Compliance: Boiler operators would monitor equipment functions and stack VE. Any malfunction immediately reported.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**Continuous Monitoring System:** Continuous Monitor N/A of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

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

Supplemental Requirements

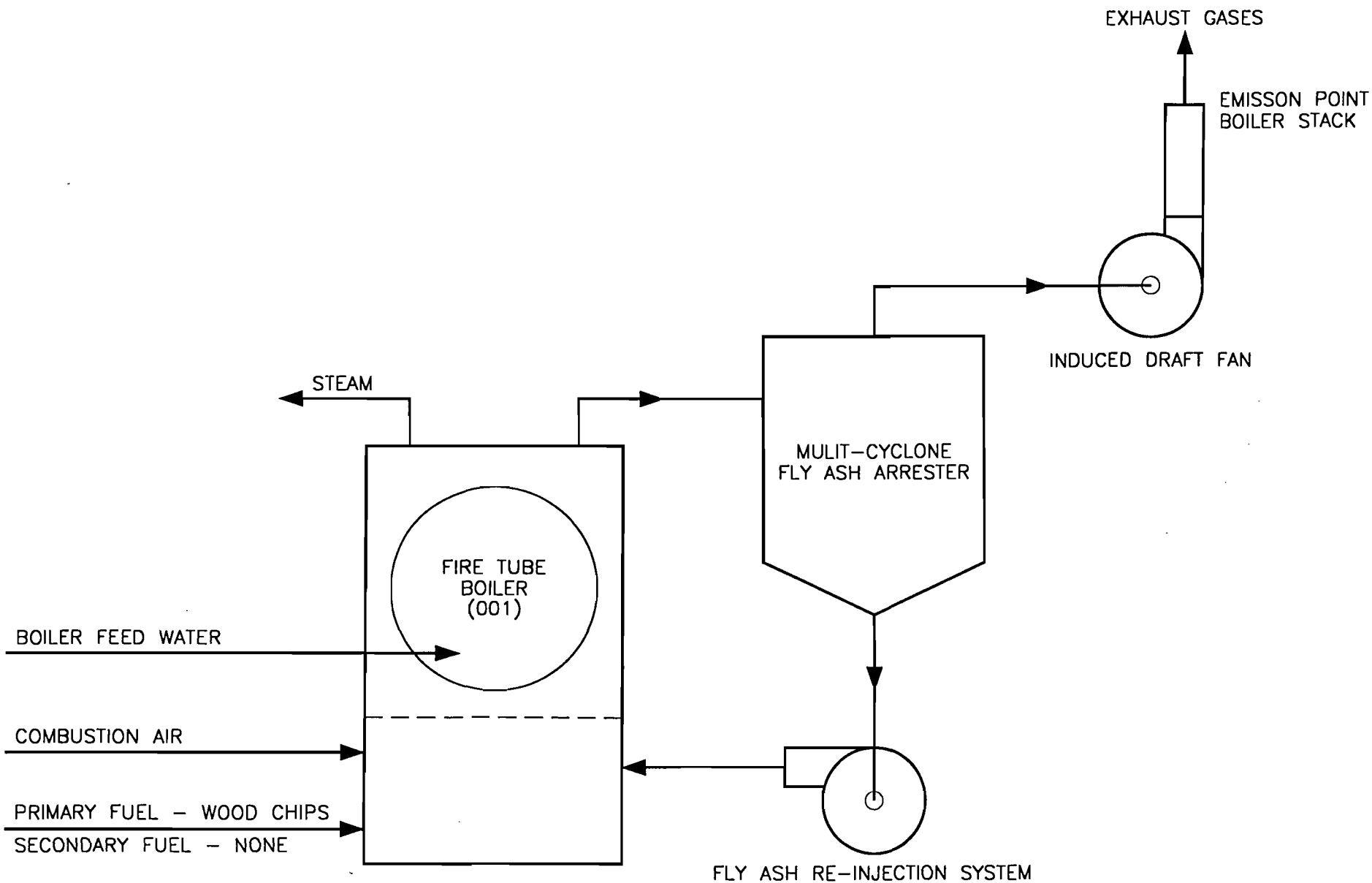
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>1E</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input checked="" type="checkbox"/> Attached, Document ID: <u>1F</u> <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT IE

Wood Fired Boiler Process Flow Diagram



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CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

EXHIBIT 1F

**Visible Emissions Testing for Wood
Fired Boiler 001 at Plant No. 1**

COPY

SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING

FROM

PLANT 1
FLORIDA FURNITURE INDUSTRIES
722 RIVER STREET
PALATKA, FLORIDA 32177

WOOD FIRED BOILER
DUST COLLECTORS A AND B

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

1070002-AV

PREPARED FOR

FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA

PREPARED BY

ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
☒ Method 1 203A 203B Other _____

Company Name
Florida Furniture Industries
 Facility Name
Plant 1
 Street Address
712 River Street
 City
PAIATKA State **FL** Zip **32177**

Process
Wood Boiler Unit # _____ Operating Mode
See Prod. data
 Control Equipment
N/A Operating Mode
N/A

Describe Emission Point
~36" circular stack grey in color

Height of Emiss. Pt.
 Start **~50'** End **Same** Height of Emiss. Pt. to Observer
 Start **~50'** End **Same**
 Distance to Emiss. Pt.
 Start **~125'** End **Same** Direction to Emiss. Pt. (Degrees)
 Start **280°** End **Same**

Vertical Angle to Obs. Pt.
 Start **~3°** End **Same** Direction to Obs. Pt. (Degrees)
 Start **280°** End **Same**
 Distance and Direction to Observation Point from Emission Point
 Start **125' - 280°** End **Same**

Describe Emissions
 Start **Coning Plume** End **Same**
 Emission Color
 Start **black** End **Same** Water Droplet Plume
 Attached ☐ Detached ☐ None ☒

Describe Plume Background
 Start **sky** End **Same**
 Background Color
 Start **blue-white** End **Same** Sky Conditions
 Start **broken** End **Same**
 Wind Speed
 Start **3-5** End **Same** Wind Direction
 Start **ESE** End **Variable**
 Ambient Temp.
 Start **60°** End **60°** Wet Bulb Temp.
 Start _____ End _____ RH Percent
 Start _____ End _____

Source Layout Sketch

Draw North Arrow
☐ TN ☒ DN

Observer's Position

Sun Location Line

Longitude _____ Latitude _____ Declination _____

Additional Information

Form Number _____ Page **1** of **1**
 Continued on VEO Form Number _____

Observation Date		Time Zone				Start Time	End Time
						0852	0922
Sec	Min	0	15	30	45	Comments	
1	0	0	0	0			
2	0	5	5	5			
3	10	10	10	10			
4	15	10	15	15			
5	15	15	15	5			
6	0	0	0	0			
7	0	0	0	5			
8	5	0	0	0			
9	0	0	0	0			
10	0	5	0	5			
11	5	0	5	5			
12	5	5	0	5			
13	5	0	0	0			
14	5	0	0	0			
15	15	15	10	10			
16	10	15	10	5			
17	5	10	10	5			
18	5	5	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	5	0	0	0			
22	5	5	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	5	0	0			
27	10	5	10	10			
28	10	10	15	15			
29	10	10	10	10			
30	5	0	0	0			

Observer's Name (Print)
Daniel Leaper
 Observer's Signature
Daniel Leaper Date **1-30-01**
 Organization
Atoll Environmental Services
 Certified by
E.T.A. Date **12-6-01**

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

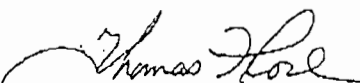
Certificate Number

Jacksonville, Florida

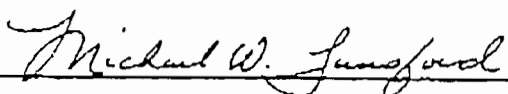
Location

December 6, 2000

Date of issue



President



Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Dry kiln Nos. 3 & 4 at Plant No. 1.			
4. Emissions Unit Identification Number:			
ID: 002		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	No. 3 8/24/84 No. 4 7/24/00	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Dry kilns loaded with poplar lumber on a 4-day cycle. Wet lumber (approximately 25% moisture) is dried to a moisture content of 8%. The dry kilns are heated by steam from the wood burning boiler located at Plant No. 1. Drying temperature is maintained by controls at 170° F. Kilns 3 and 4 are in separate buildings.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

N/A

2. Control Device or Method Code(s): N/A

Emissions Unit Details

1. Package Unit:	
Manufacturer: BOLD Designs	Model Number: 4290
2. Generator Nameplate Rating: N/A	MW
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	200,000 bdf/4 days = 18,200,000 bdf/yr	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p>Kilns operate 24-hours per day, 7 days per week, 52 weeks per year. Cycle time is approximately 4 days or 91 cycles per year. An average of 8,928,610 bdf/yr of lumber was dried in the kilns in 1999 and 2000.</p>		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 002		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No VE.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: 002			
5. Discharge Type Code: R	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: 170 °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Kiln No. 3 = 23 feet Kiln No. 4 = 29	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3283.9			
14. Emission Point Comment (limit to 200 characters): Kiln Nos. 3 and 4 emission points are wall vents front and rear.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of

1. Segment Description (Process/Fuel Type) (limit to 500 characters): N/A – Steam is generated by wood fired boiler (001).		
2. Source Classification Code (SCC): N/A	3. SCC Units: N/A	
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment of N/A

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):	3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	N/A	N/A	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.44 lb/hour 1.92 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 to tons/year	
6. Emission Factor: 0.211 lb/1000 bdf Reference:	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters): $\frac{(0.211 \text{ lb VOC} / 1000 \text{ bdf})(200,000 \text{ bdf} / 4 \text{ days})}{(24 \text{ hr day}^{-1})} = 0.44 \text{ lb hr}^{-1}$ $\frac{(0.211 \text{ lb VOC} / 1000 \text{ bdf})(18,200,000 \text{ bdf} / \text{yr}^{-1})}{(2000 \text{ lbs ton}^{-1})} = 1.92 \text{ tons yr}^{-1}$	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation N/A of

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

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of

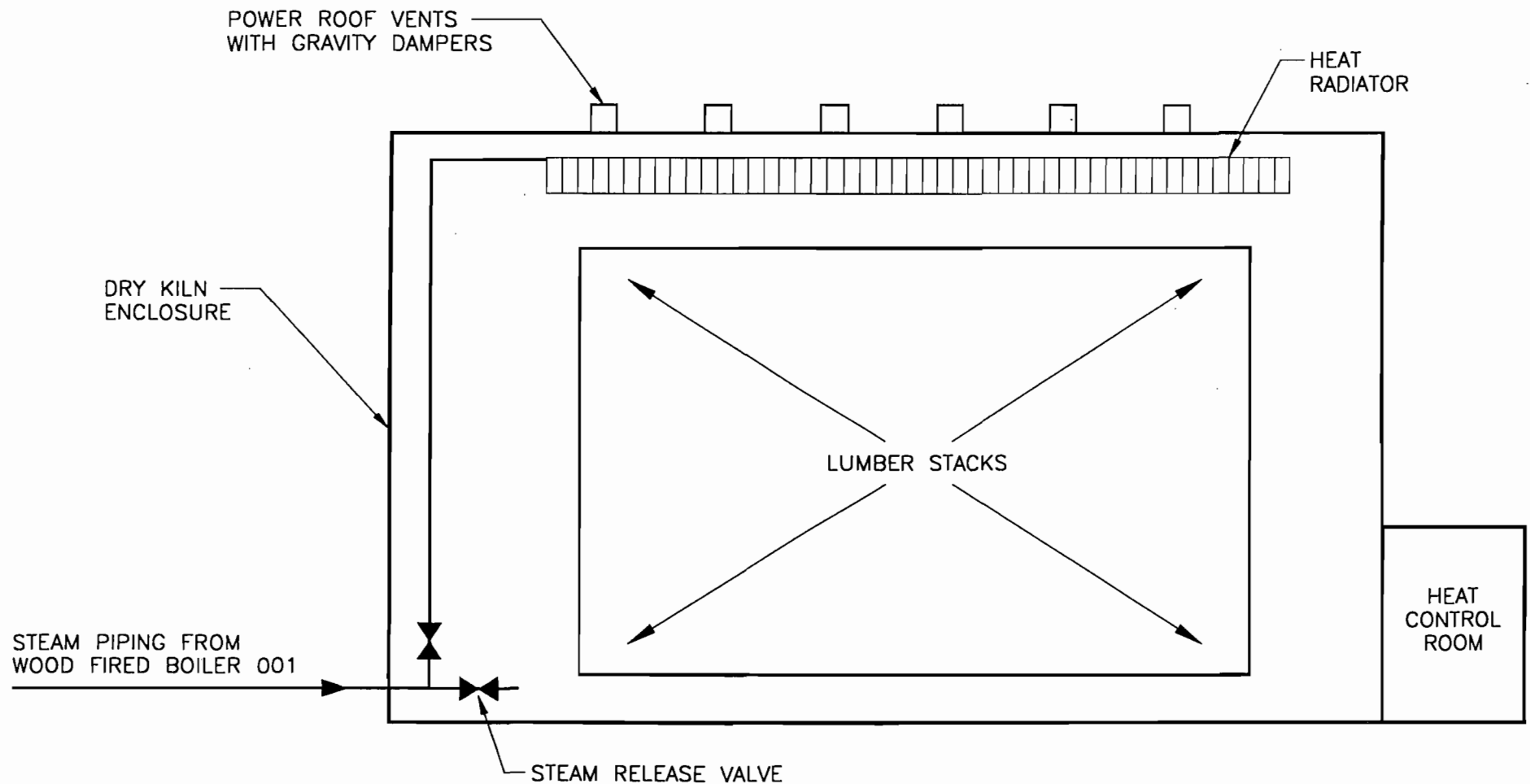
1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 1G

Dry Kiln Process Flow Diagram



DRY KILN No. 3 & 4
EMISSION UNIT DK1

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Wood dust collection unit consisting of 2 bag filter units and cyclone unit at Plant No. 1 site.			
4. Emissions Unit Identification Number:			
ID: 003		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	Bag Filters 7/89 Cyclone 4/97	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Wood dust and chips originate from the woodworking area. The dust and chips are pneumatically conveyed under vacuum to the wood storage house via closed loop system. Air is filtered at Bag Filter Unit A and B prior to being discharged to the atmosphere.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter A

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 7,044 S.F. of filter area

456 Filter Bags, each 12' long

16 oz. Single Polyester Felt Filter Bags, 99.96% efficient @ 3 microns

Air to Cloth Ratio – 9.76:1

Filtered Air – 68,780 CFM

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:		
Manufacturer: Pneumafil Corporation	Model Number: 13.5-456-12	
2. Generator Nameplate Rating: N/A MW		
3. Incinerator Information: N/A		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter B

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 7,044 S.F. of filter area

456 Filter Bags, each 12' long

16 oz. Single Polyester Felt Filter Bags, 99.96% efficient @ 3 microns

Air to Cloth Ratio – 9.52:1

Filtered Air – 67,035 CFM

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:		
Manufacturer:	Pneumafil Corporation	Model Number: 13.5-456-12
2. Generator Nameplate Rating: N/A MW		
3. Incinerator Information: N/A		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	5,236 lb/hr	
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Maximum capacity = 5,236 lb/hr as per phone conversation with Chas Campbell of Clean Air Systems, Statesville, NC, (704) 873-9998. Current throughput based on year 2000 data is estimated at 2,615 lb/hr.		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
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62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
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62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C.: Annual Emissions Fee	
62-213.400 F.A.C.: Permits and Permit Revisions Required.	
62-213.410 F.A.C.: Changes without Permit Revision	
62-213.412 F.A.C.: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C.: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C.: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 003		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. Clean air discharge point on Bag Filter Unit A. 2. Clean air discharge point on Bag Filter Unit B. 3. Cyclone has no emission point as its air discharge is returned to the bag filters.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: H	6. Stack Height: N/A feet	7. Exit Diameter: N/A feet	
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: N/A acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Filters A & B = 50 feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 438.3 North (km): 3278.9			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): N/A		
2. Source Classification Code (SCC): N/A		3. SCC Units: N/A
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

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

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control: 99.96	
3. Potential Emissions: 2.09 lb/hour 9.17 tons/year		4. Synthetically Limited? [X]	
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.04 % Reference: Manufacturer's data.		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): $5,236 \text{ lb/hr} \times 0.04\% = 2.09 \text{ lb/hr}$ $\frac{2.09 \text{ lb/hr} \times 8,760 \text{ hrs/yr}}{2000 \text{ lbs/ton}} = 9.17 \text{ tons/yr}$			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A			

Allowable Emissions Allowable Emissions _____ of _____ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation N/A of _____

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: N/A % Maximum Period of Excess Opacity Allowed: N/A min/hour	
I. Method of Compliance: Testing of VE at minimum of 90% of operating rate.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

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

Supplemental Requirements

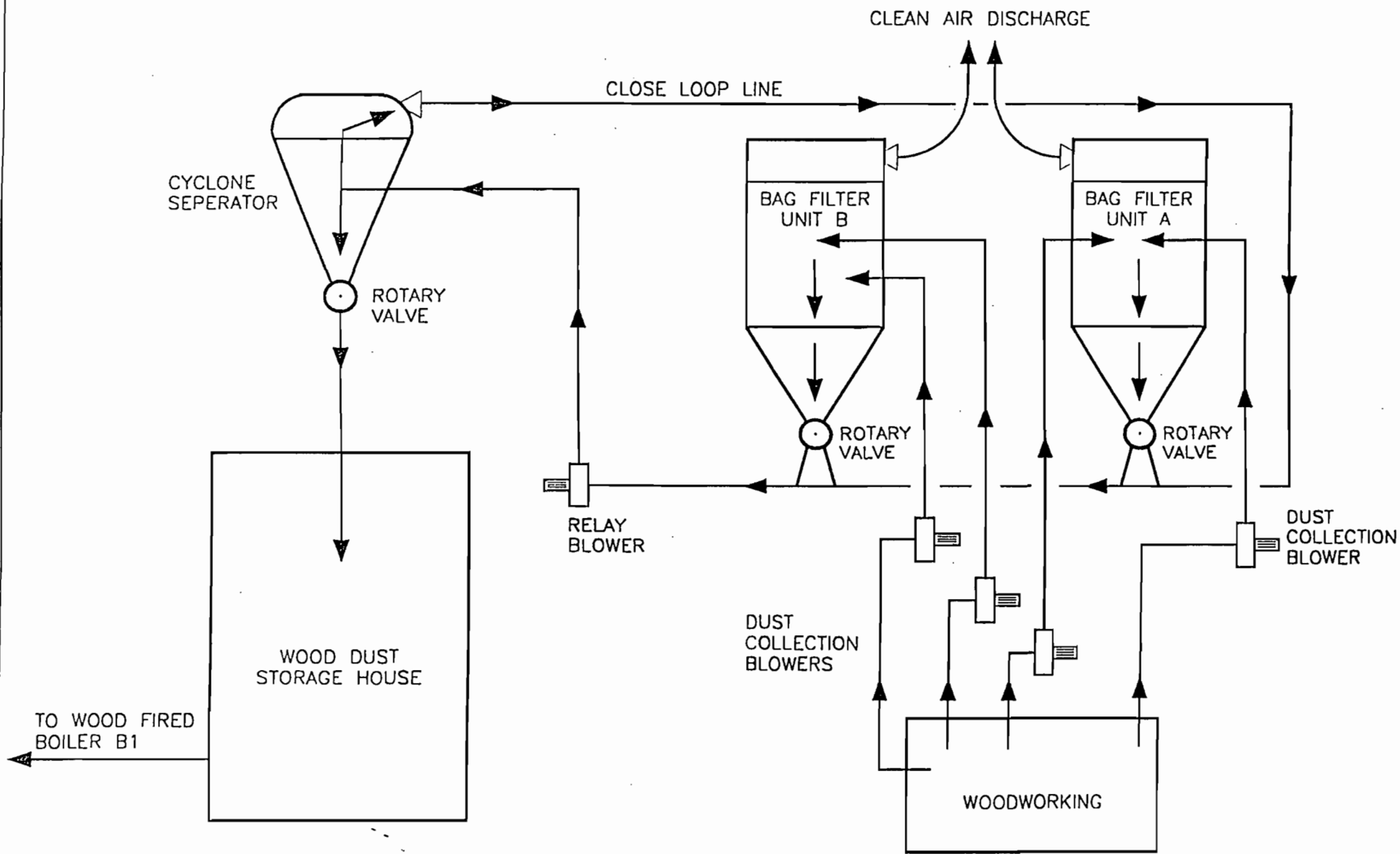
1. Process Flow Diagram [X] Attached, Document ID: <u>1D</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: _____ [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Compliance Test Report [X] Attached, Document ID: <u>1H</u> [] Previously submitted, Date: _____ [] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:
N/A

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 1D

Woodworking Dust Collection Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

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

EXHIBIT 1H

**Visible Emissions Testing for Wood Dust
Collection at Plant No. 1**

COPY

SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING
FROM

PLANT 1
FLORIDA FURNITURE INDUSTRIES
722 RIVER STREET
PALATKA, FLORIDA 32177

WOOD FIRED BOILER
DUST COLLECTORS A AND B

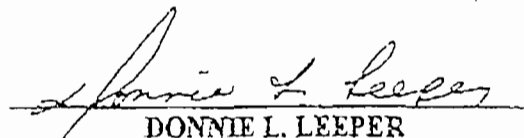
JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

1070002-AV

PREPARED FOR
FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA

PREPARED BY
ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)

Method 9	203A	203B	Other:

Company Name		Florida Furniture	
Facility Name		Plant 1	
Street Address		762 River Street	
City	State	Zip	
PALATKA	FL	32177	

Process Dust collector	Unit A	Operating Mode See Arch. data
Control Equipment Bathroom		Operating Mode continuous

Describe Emission Point			36" X 36" Square		
duct on side of baghouse					
Height of Emiss. Pt. Start ~ 35' End Same			Height of Emiss. Pt. Rel. to Observer Start = 30' End Same		
Distance to Emiss. Pt. Start ~ 100' End Same			Direction to Emiss. Pt. (Compass) Start 280° End Same		

Vertical Angle to Obs. Pt.	Direction to Obs. Pt. (Degrees)
Start 210° End <i>Same</i>	Start 7.87° End <i>Same</i>
Distance and Direction to Observation Point from Emission Point	
Start $\sim 100 - 7.81$ End <i>Same</i>	

Direction Emissions		End	
Start	Clear	End	Same
Emission Color		Water Droplet Plume	
Start	Clear	End	Same
Attached <input type="checkbox"/>		Detached <input type="checkbox"/>	
		None <input checked="" type="checkbox"/>	

Describe Plume Background			
Start	SKY	End	Same
Background Color		Sky Conditions	Cloudy
Start	blue	End	Same
Wind Sped		Wind Direction	
Start	3-5	End	Same
Ambient Temp.		Start	ESE
Start	100°	End	Same
		Wet Bulb Temp.	RH Percent

Source Layout Sketch

Draw North Arrow

Observation Point

Observer's Position

140°

Sun Location Line

FEED

FERT

Side View

Stack With Pumps

Sun

Wind

Longitude

Latitude

Declination

Additional Information

Form Number								Page		of		
Continued on VEO Form Number												

Observation Date		Time Zone		Start Time	End Time
1-30-01		EST		0814	0844
Sec Min	0	15	30	45	Comments
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)	Donnie Leeper	
Observer's Signature	<i>[Signature]</i>	Date 1-30-01
Organization	Astek Environmental Services	
Carried by	E. A. ..	Date 12-6-00

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	205A	205B	Other
--------------------------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 1		
Street Address	717 River Street		
City	Atlanta	State	FL
Zip	32177		

Process	Best Collector	Unit	A	Operating Mode	See first data
Control equipment	Baghouse			Operating Mode	Continuous

Describe Emission Point			
36" x 36" SQUARE duct on side of baghouse			
Height of Emiss. Pt.	Start ~35'	End Same	Height of Emiss. Pt. Rel. to Observer
Start ~35'	End Same	Start ~30'	End Same
Distance to Emiss. Pt.	Start 105'	End Same	Direction to Emiss. Pt. (Degrees)
Start 105'	End Same	Start 282°	End Same

Vertical Angle to Obs. Pt.	Start	End	Direction to Obs. Pt. (Degrees)
Start	End	Start 782°	End Same
Distance and Direction to Observation Point from Emission Point	Start 105' - 282°	End Same	

Describe Emissions			
Start	Char	End	Same
Emission Color	Start	Char	End Same
Water Droplet Plume	Attached	Detached	None

Describe Plume Background			
Start	SKY	End	Same
Background Color	Start	Blue	End Same
Wind Speed	Start	3-5	End Same
Wind Direction	Start	ENE	End Same
Ambient Temp.	Start	60°	End 60°
Wet Bulb Temp.	Start		End Percent

Source Layout Sketch		Draw North Arrow
		<input type="checkbox"/> IN <input checked="" type="checkbox"/> OUT
Longitude	Latitude	Declination

Additional Information

Form Number		Page	1	of	1
Continued on VEO Form Number					

Sec	Time Zone				Start Time	End Time
	0	15	30	45		
1	0	0	0	0	0814	0844
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
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11	0	0	0	0		
12	0	0	0	0		
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18	0	0	0	0		
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23	0	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

Observer's Name (Print)	Donnie Leeper	
Observer's Signature	Donnie Leeper	Date
Organization	Astech Environmental Services	Date
Carried by	ETA	Date
		12-6-00

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

Thomas Hore

President

Michael W. Lunsford

Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Wood Fired Boiler fed by wood chips and sawdust from woodworking dust collection system (005) at Plant No. 3.			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 001 (Renummer to 004)			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	12/85	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Boiler provides steam to plant for drying ovens in the finish coating operation and for heating of the manufacturing facility.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Wood burning boiler fed by wood chips and sawdust with multi-cyclone Fly Ash Arrestor.

2. Control Device or Method Code(s): 076

Emissions Unit Details

1. Package Unit:

Manufacturer: Hurst Firebox System

Model Number: -

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	8.74	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	1,068 lb/hr	12.82 tons/day
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Capacity based on original permitted rates.		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 004		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Boiler stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 35 feet	7. Exit Diameter: 1.8 feet	
8. Exit Temperature: 450 °F	9. Actual Volumetric Flow Rate: 3,700 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.3 North (km): 3283.6			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC): 1-02-009-06		3. SCC Units: tons burned
4. Maximum Hourly Rate: 0.54	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0	8. Maximum % Ash: 0.6	9. Million Btu per SCC Unit: 16.37 mmbtu/ton
10. Segment Comment (limit to 200 characters): N/A		

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO	076	N/A	NS
PM	076	N/A	NS
VOC	076	N/A	NS

Potential/Fugitive Emissions N/A

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: Manufacturer's data.	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters): 	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): 	

Allowable Emissions	Allowable Emissions	of	N/A
----------------------------	---------------------	----	-----

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: 40% Maximum Period of Excess Opacity Allowed: 2 min/hour Stack VE. Annual VE test. Any malfunction immediately reported.	
I. Method of Compliance: Boiler operators monitor equipment functions and stack VE. Annual VE test. Any malfunction immediately reported.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**Continuous Monitoring System:** Continuous Monitor N/A of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): 	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION **(Regulated Emissions Units Only)**

Supplemental Requirements

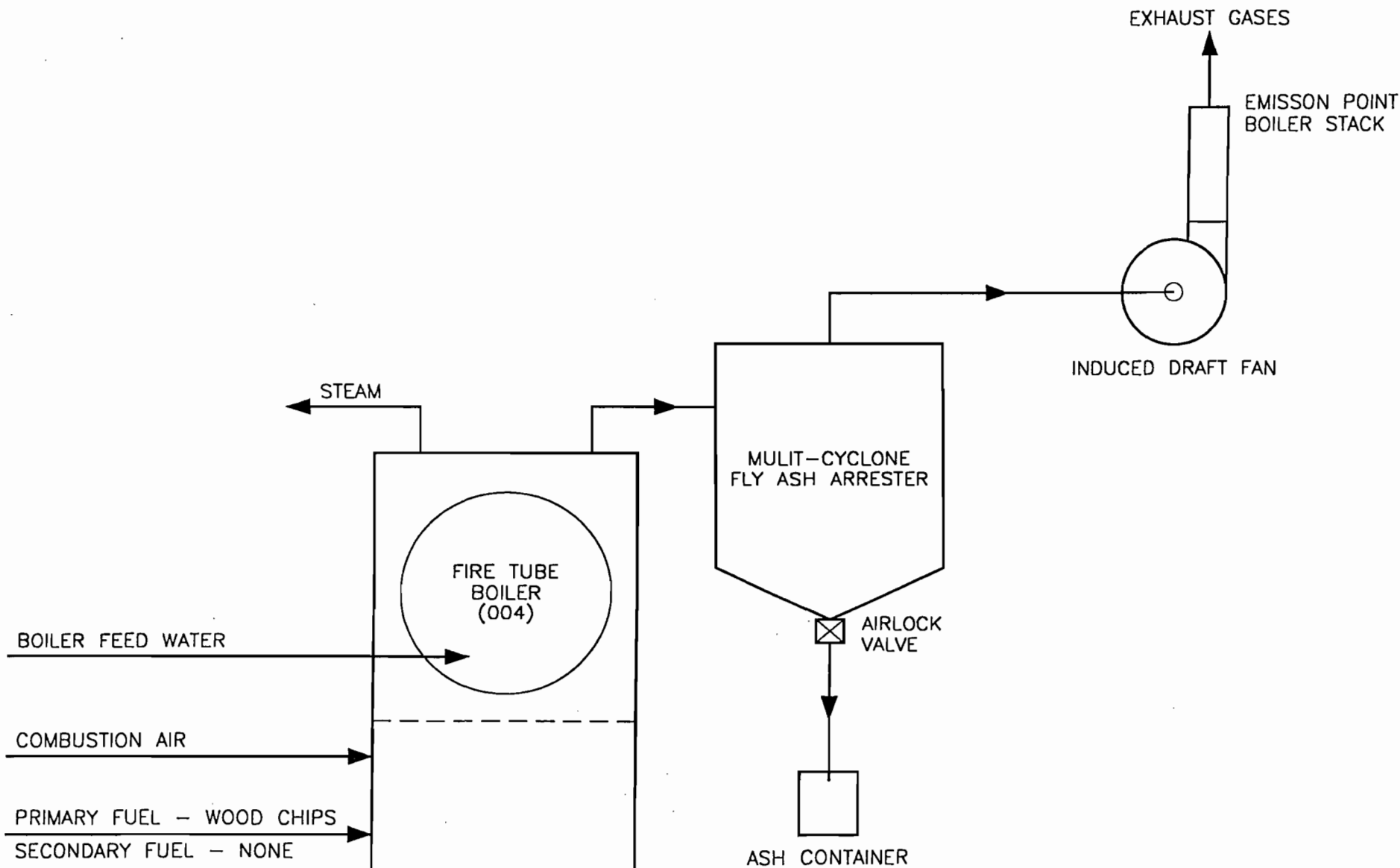
1. Process Flow Diagram [X] Attached, Document ID: <u>3E</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Compliance Test Report [X] Attached, Document ID: <u>3F</u> [] Previously submitted, Date: _____ [] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation [] Attached, Document ID: _____ [X] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [] Attached, Document ID: _____ [X] Not Applicable
13. Identification of Additional Applicable Requirements [] Attached, Document ID: _____ [X] Not Applicable
14. Compliance Assurance Monitoring Plan [] Attached, Document ID: _____ [X] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [X] Not Applicable

EXHIBIT 3E

Wood Fired Boiler Process Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Wood Fired Boiler Process Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3E
Palatka, Florida

Exhibit 3F

**Visible Emissions Testing for Wood Fired
Boiler at Plant No. 3**

SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING

FROM

PLANT 3
FLORIDA FURNITURE INDUSTRIES
160 COMFORT ROAD
PALATKA, FLORIDA 32177

WOOD FIRED BOILER
DUST COLLECTORS A,B,C AND D

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

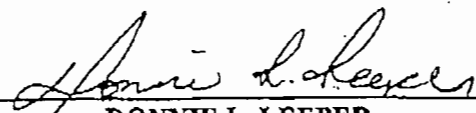
1070026-AV

PREPARED FOR

FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA

PREPARED BY

ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	200A	200B	Other
--------------------------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 3		
Street Address	160 Comfort Road		
City	State	Zip	
PALETTA	FL	32177	

Process	Unit #	Operating Mode
Wood fired boiler		See ind. data
Control Equipment		Operating Mode
N/A		N/A

Describe Emission Point			
15" Circular Stack - black			
in color			
Height of Emiss. Pt.	Start	End	
~30'	~30'	Same	
Distance to Emiss. Pt.	Start	End	
~125'	~125'	Same	
Direction to Emiss. Pt. (Degrees)	Start	End	
285°	285°	Same	

Vertical Angle to Obs. Pt.	Start	End	
27°	27°	Same	
Direction to Obs. Pt. (Degrees)	Start	End	
285°	285°	Same	
Distance and Direction to Observation Point from Emission Point			
Start	End		
125' - 285°	Same		

Describe Emission			
Start	End		
Heavily	Same		
Emission Color	Water Droplet Plume		
Start	End	Attached	Detached
Char	Same		None

Describe Plume Background			
Start	End		
SKY	Same		
Background Color	Start	End	
gray	gray	Same	
Wind Speed	Start	End	
5-10	5-10	Same	
Ambient Temp.	Start	End	
65°	65°	Same	
Wet Bulb Temp.	Start	End	
		Same	

Source Layout Sketch		Draw North Arrow
		<input type="checkbox"/> TN <input checked="" type="checkbox"/> TAN
X Observation Point Observer's Position Sun Location Line 140°		Feet Feet Box View Stack With Plume Sun Wind
Longitude	Latitude	Declination

Additional Information	
------------------------	--

Form Number	Page	of
	1	1
Continued on VEO Form Number		

Observation Date	Time Zone	Start Time	End Time			
1-30-01	EST	1005	1035			
Min	Sec	0	15	30	45	Comments
1	0	0	0	0		
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
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25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

Observer's Name (Print)	Date
Hannie Leeper	1-30-01
Observer's Signature	
Hannie Leeper	
Organization	
Atch Environmental Services	
Conducted by	Date
E.T.A.	12-6-01

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

Thomas Hale

President

Michael W. Langford

Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Wood dust collecting unit at Plant No. 3 consisting of 4 bag filter units.			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 002 (renumber to 005)			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	12/85	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Wood dust originates from the wood working area. This dust is pneumatically conveyed under vacuum to the dust silo via closed loop system. Air is filtered at Bag Filter units A, B, & C. Bag Filters A & B discharge to the atmosphere while Bag Filter C air is returned to the interior of the plant. Bag Filter D separates wood chips from the wood hog chipping operation.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter A at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 5,767 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 8.72=1

Filtered Air – 50.287 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: 13.5-448-10

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter B at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 5,767 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 9.49:1

Filtered Air – 54,709 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:	
Manufacturer: Pneumafil Corporation	Model Number: 13.5-448-10
2. Generator Nameplate Rating: N/A MW	
3. Incinerator Information: N/A	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter C at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 5,922 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 9.15:1

Filtered Air – 54,200 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: 13.5-448-10

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Bag Filter D at Plant No. 3

Pneumafil Corporation Wood Dust Filter with continuous once a minute reverse air cleaning of filter media.

13.5' dia. Filter, 3,325 S.F. of filter area

448 Filter Bags, each 10' long

16 oz. Single Polyester Felt Filter Bags

99.96% efficiency @ 3 microns

Air to Cloth Ratio – 7.5:1

Filtered Air – 24,500 cfm

2. Control Device or Method Code(s): 101

Emissions Unit Details

1. Package Unit:

Manufacturer: Pneumafil Corporation

Model Number: -

2. Generator Nameplate Rating: N/A

MW

3. Incinerator Information: N/A

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate: 6,958 lb/hr (total all 4 units)		
4. Maximum Production Rate: N/A		
5. Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Total capacity of 6,958 lb/hr as per phone conversation with Chas Campbell of Clean Air Systems, Statesville, NC, (704) 873-9998.		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 005		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): 1. Clean air discharge point on Bag Filter A at Plant No. 3. 2. Clean air discharge point on Bag Filter B at Plant No. 3. 3. Clean air return to plant on Bag Filter C at Plant No. 3. 4. Closed loop return line on Bag Filter D at Plant No. 3.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: Filters A & B = V Filters C & D = P		6. Stack Height: Filters A, B, & C = 26 feet Filter D = 24 feet	
7. Exit Diameter: Filters A, B, & C = 3.8 feet Filter D = 3.3 feet		8. Exit Temperature: All Filters = 77°F	
9. Actual Volumetric Flow Rate: Filter A = 50,287 Filter B = 54,709 acfm Filter C = 54,200 acfm Filter D = 24,500 acfm		10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.4 North (km): 3283.4			
14. Emission Point Comment (limit to 200 characters): N/A			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Burning of sawdust and wood chips in boiler.		
2. Source Classification Code (SCC):		3. SCC Units: tons burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: mmbtu/ton
10. Segment Comment (limit to 200 characters): 		

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM 10	101	0	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: PM/PM10	2. Total Percent Efficiency of Control: 99.96
3. Potential Emissions: 2.78 lb/hour 12.19 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: Reference: Manufacturer's data.	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): Max process rate = 6,958 lb/hr Emission Factor = 0.04% (6,958 lb/hr)(0.04%) = 2.78 lb/hr 2.78 lb/hr x 8,760 hr/yr / 2000 lb/ton = 12.19 ton/yr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): N/A	

Allowable Emissions Allowable Emissions _____ of _____ N/A

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE 20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 20% Exceptional Conditions: N/A% Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: Testing of VE at minimum of 90% of operating rate.	
5. Visible Emissions Comment (limit to 200 characters): N/A	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of _____

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

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

Supplemental Requirements

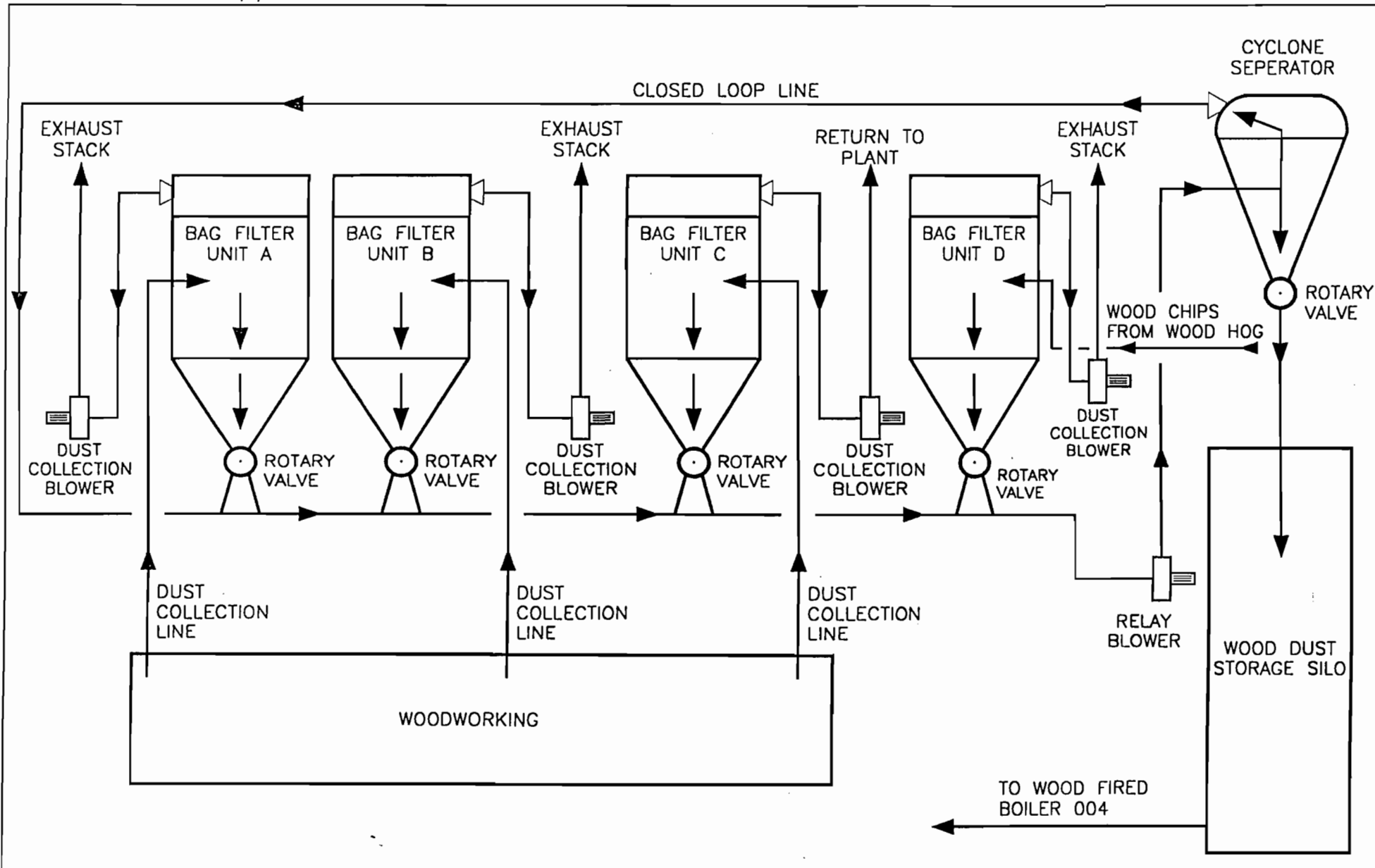
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>3D</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input checked="" type="checkbox"/> Attached, Document ID: <u>3G</u> <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:
N/A

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NO _x Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NO _x Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 3D

Woodworking Dust Collection Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

Woodworking Dust Collection Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3D
Palatka, Florida

Exhibit 3G

**Visible Emissions Testing for Wood Dust
Collection at Plant No. 3**

SOURCE TEST REPORT
VISIBLE EMISSIONS TESTING

FROM

PLANT 3
FLORIDA FURNITURE INDUSTRIES
160 COMFORT ROAD
PALATKA, FLORIDA 32177

WOOD FIRED BOILER
DUST COLLECTORS A,B,C AND D

JANUARY 30, 2001

TITLE V AIR PERMIT NUMBER

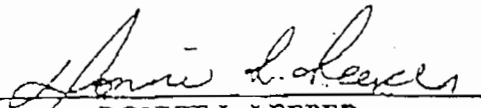
1070026-AV

PREPARED FOR

FLORIDA FURNITURE INDUSTRIES
P.O. BOX 710
PALATKA, FLORIDA

PREPARED BY

ASTECH ENVIRONMENTAL SERVICES
13170-58 ATLANTIC BLVD. SUITE 131
JACKSONVILLE, FLORIDA 32225
(904) 221-7174


DONNIE L. LEEPER

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	Method 9	203A	203B	Other
--------------------------	----------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 3		
Street Address	160 Comfort Road		
City	State	Zip	
Palatka	FL	32177	

Process	Unit #	Operating Mode
Dust collector	A	See Prod. data
Control Equipment		Operating Mode
Baghouse		Continuous

Describe Emission Point			
36" galvanized steel (circular)			
Height of Emiss. Pt.	Start	End	Height of Emiss. Pt. Rel. to Observer
25'	25'	Same	25'
Distance to Emiss. Pt.	Start	End	Direction to Emiss. Pt. (Degrees)
100'	100'	Same	264°

Vertical Angle to Obs. Pt.	Start	End	Direction to Obs. Pt. (Degrees)
21°	21°	Same	264°
Distance and Direction to Observation Point from Emission Point			
Start 100' - 264° End Same			

Describe Emissions			
Start	End	Water Droplet Plume	
Clear	Same	Attached	Detached
Start	End	Attached	Detached
Clear	Same	None	

Describe Plume Background			
Start	End	Start	End
Sky	Same	Sky Conditions	Same
Background Color	Same	Wind Direction	Same
Start	End	Start	End
grey	Same	5-10 mph	Same
Wind Speed	Same	Start	End
5-10 mph	Same	SE	Same
Ambient Temp.	Start	Wet Bulb Temp.	Rel. Percent
65°	65°		

Source Layout Sketch		Draw North Arrow
		<input type="checkbox"/> IN SHUN <input type="checkbox"/> OUT SHUN
Longitude Latitude Declination		

Additional Information

Form Number	Page
Continued on VEO Form Number	

Observation Date	Time Zone	Start Time	End Time		
1-30-01	EST	1005	1035		
Sec	0	15	30	45	Comments
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)	Bonnie Leeper	
Observer's Signature	Leeper	Date 1-30-01
Organization	Atech Environmental Services	
Certified by	EST.A.	Date 12-6-00

MAR. -08' 01 (THU) 14:07

FFI FIRST AID

TEL: 9043295455

P. 015

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
☒ Method 1 ☐ 203A ☐ 203B ☐ Other _____

Company Name Florida Furniture Industries
 Facility Name Plant 3
 Street Address 1160 Comfort Road
 City PALATKA State FL Zip 32177

Process Dust Collector Unit # B Operating Mode see And. data
 Control Equipment Baghouse Operating Mode continuous

Describe Emission Point
36" circular galvanized stack
 Height of Emiss. Pt. Start 20' End Same Height of Emiss. Pt. Rel. to Observer Start 30' End Same
 Distance to Emiss. Pt. Start 110' End Same Direction to Emiss. Pt. (Degrees) Start 276° End Same

Vertical Angle to Obs. Pt. Start 21° End Same Direction to Obs. Pt. (Degrees) Start 276° End Same
 Distance and Direction to Observation Point from Emission Point Start 110' - 276° End Same

Describe Emissions
 Start Clear End Same
 Emission Color Start Clear End Same Attached ☐ Detached ☐ None ☒
 Water Droplet Plume ☐

Describe Plume Background
 Start sky End Same
 Background Color Start grey End Same Sky Conditions Start broken End Same
 Wind Speed Start 5-10 End Same Wind Direction Start SE End Same
 Ambient Temp. Start 65° End 65° Wet Bulb Temp. ☐ RH Percent ☐

Source Layout Sketch
 Draw North Arrow ☐ IN ☒ OUT

 Longitude _____ Latitude _____ Declination _____

Additional Information

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

Observation Date		Time Zone		Start Time	End Time
1-30-01		EST		1005	1035
Sec Min	0	15	30	45	Comments
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print) Bonnie Leary
 Observer's Signature Bonnie Leary Date 1-30-01
 Organization Asphalt Environmental Service
 Certified by F.T.G. Date 12-01

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)	200A	200B	Other
--------------------------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 3		
Street Address	160 Comfort Road		
City	Palatka	State	FL
Zip	32177		

Process	Dust Collector	Unit	C	Operating Mode	See Prod data
Control Equipment	Baghouse	Operating Mode	Continuous		

Describe Emission Point		36" x 36" Square	
duct			
Height of Emiss. Pt.	Start	End	Height of Emiss. Pt. Rel. to Observer
Start	Level	End	Same
Distance to Emiss. Pt.	Start	End	Direction to Emiss. Pt. (Degrees)
Start	50'	End	Same
Start	270°	End	Same

Vertical Angle to Obs. Pt.	Start	End	Direction to Obs. Pt. (Degrees)
Start	Level	End	Same
Distance and Direction to Observation Point from Emission Point	Start	End	Same
Start	50' - 270°	End	Same

Describe Emissions		Same	
Start	Clear	End	Same
Emission Color	Start	End	Water Droplet Plume
Start	Clear	End	Attached <input type="checkbox"/> Detached <input type="checkbox"/> None <input checked="" type="checkbox"/>

Describe Plume Background		Same	
Start	sky	End	Same
Background Color	Start	End	Sky Conditions
Start	grey	End	Same
Wind Speed	Start	End	Same
Start	5-10	End	Same
Wind Direction	Start	End	Same
Start	UAR: Atkand	End	Same
Ambient Temp.	Start	End	Well Bld Temp.
Start		End	Relative Humidity

Source Layout Sketch		Draw North Arrow	
Air-flow		N	
Observation Point		BAGHOUSE	
roofline		Level	
Observer's Position		FEET	
Sun Location Line		Scale View	
Longitude		Latitude	
Destination		Wind	

Additional Information

Form Number		Page	1	of	1
Continued on VEO Form Number					

Observation Date	Time Zone	Start Time	End Time	Comments	
7-30-01	EST	1040	1110		
Sec	0	15	30	45	
1	0	0	0	0	
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

Observer's Name (Print)	Donnie Leeper	
Observer's Signature	Donnie Leeper	Date
Organization	Astech Environmental Services	
Certified By	E.T.A.	Date
		12-26-05

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method (Use Only One)	203A	203B	Other
-----------------------	------	------	-------

Company Name	Florida Furniture Industries		
Facility Name	Plant 3		
Street Address	160 Comfort Road		
City	PAIATICA	State	FL
		Zip	32177

Process	Dust Collector	Unit	D	Operating Mode	See Prod. data
Control Equipment	BAGhouse			Operating Mode	Continuous

Describe Emission Point	
36" x 36" duct on side of BAGhouse	
Height of Emis. Pt.	Start 235' End Same
Height of Emis. Pt. Rel. to Observer	Start level End Same
Distance to Emis. Pt.	Start 75' End Same
Direction to Emis. Pt. (Degrees)	Start 280° End Same

Vertical Angle to Obs. Pt.	Start level End Same
Direction to Obs. Pt. (Degrees)	Start 280° End Same
Distance and Direction to Observation Point from Emission Point	Start 75' - 280° End Same

Describe Emissions	Start Clear End Same
Emission Color	Start Clear End Same
Water Droplet Plume	Attached <input type="checkbox"/> Detached <input type="checkbox"/> None <input checked="" type="checkbox"/>

Describe Plume Background	Start Sky End Same
Background Color	Start Gray End Same
Wind Speed	Start 5-10 End Same
Wind Direction	Start Variable End Same
Ambient Temp.	Start End
Wet Bulb Temp.	Start End
RH Percent	Start End

Source Layout Sketch		Draw North Arrow
		<input checked="" type="checkbox"/> IN SKY <input type="checkbox"/> ON GROUND
Longitude	Latitude	Declination

Additional Information

Form Number		Page	1	of	1
Continued on VEO Form Number					

Observing Date	1-30-01	Time Zone	EST	Start Time	1040	End Time	1110
Sec	0	15	30	45	Comments		
Min	0	15	30	45			
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	0	0			
7	0	0	0	0			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
17	0	0	0	0			
18	0	0	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	0	0	0	0			
22	0	0	0	0			
23	0	0	0	0			
24	0	0	0	0			
25	0	0	0	0			
26	0	0	0	0			
27	0	0	0	0			
28	0	0	0	0			
29	0	0	0	0			
30	0	0	0	0			

Observer's Name (Print)	Donnie Leeper
Observer's Signature	Donnie Leeper
Date	1-30-01
Organization	Attech Environmental Services
Contact By	

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Donnie Leeper

met the specifications of Federal Reference Method 9
and qualified as a visible emissions evaluator.

Maximum deviation on white and black smoke did not
exceed 7.5% opacity and no single error exceeding
15% opacity was incurred during the certification test
conducted by Eastern Technical Associates of Raleigh,
North Carolina. This certificate is valid for six months
from date of issue.

282429

Certificate Number

Jacksonville, Florida

Location

December 6, 2000

Date of Issue

Thomas Hore

President

Michael W. Lunsford

Director of Training

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Finish coating operation at Plant No. 3.			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 003 (to be renumbered to 006)			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A	12/85	2511	<input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
Wood parts are coated in spray booths using air, airless, air assisted or HVLP spray where possible. Also, print coating, dip coating and hand pad staining takes place. Finished product is dried in steam heated ovens in the Finishing Room.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

1. Paper mesh with polyester backing filter on spray booths with 98.5 – 99.5% efficiency.
2. Waterborne coatings used in staining, print coating, dip coating and spray coating where possible.

2. Control Device or Method Code(s): 101, 104

Emissions Unit Details

1. Package Unit:		
Manufacturer:	George Bee Finishing System	Model Number: N/A
2. Generator Nameplate Rating:	N/A	MW
3. Incinerator Information: N/A		
	Dwell Temperature:	°F
	Dwell Time:	seconds
	Incinerator Afterburner Temperature:	°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	N/A	mmBtu/hr
2. Maximum Incineration Rate:	N/A lb/hr	tons/day
3. Maximum Process or Throughput Rate:	<u>240</u>	Furniture Units/hr
4. Maximum Production Rate:	N/A	
5. Requested Maximum Operating Schedule:		
	8 hours/day	5 days/week
	52 weeks/year	1,926.5 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<u>VOC Emissions from Finish Coating Operations</u> 1999: Plant Nos. 1 & 3 combined = 378.30 tons = 756,608.8 lbs 2000: Plant Nos. 1 & 3 combined = 364.79 tons = 729,570.3 lbs Average hours of operation for Plant Nos. 1 & 3 in 1999 = 1925 hrs Average hours of operation for Plant Nos. 1 & 3 in 2000 = 1928 hrs Average hourly emissions rate = $\frac{378.30 \text{ tons} + 364.79 \text{ tons}}{1925 \text{ hrs} + 1928 \text{ hrs}} = 0.1929 \text{ tons / yr}$ (371.55 tons/yr)(0.1929 tons/hr) = 1926 hrs/yr		

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAP).	CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95
40 CFR 82: Protection of Stratospheric Ozone.	62-103.150, F.A.C.: Public Notice of Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and Emission Reduction.	62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95.	CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 3-21-96.
62-4.030, F.A.C.: General Prohibition.	62-210.300, F.A.C.: Permits Required.
62-4.040, F.A.C.: Exemptions.	62-210.300(1), F.A.C.: Air Construction Permits.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application.	62-210.300(2), F.A.C.: Air Operation Permits.
62-4.060, F.A.C.: Consultation.	62-210.300(3), F.A.C.: Exemptions.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.	62-210.300(3)(a), F.A.C.: Full Exemptions.
62-4.080, F.A.C.: Modification of Permit Conditions.	62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-4.090, F.A.C.: Renewals.	62-210.300(5), F.A.C.: Notification of Startup.
62-4.100, F.A.C.: Suspension and Revocation.	62-210.300(6), F.A.C.: Emissions Unit Reclassification.
62-4.110, F.A.C.: Financial Responsibility.	62-210.350, F.A.C.: Public Notice and Comment.
62-4.120, F.A.C.: Transfer of Permits	62-210.350(3), F.A.C.: Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
62-4.130, F.A.C.: Plant Operation - Problems.	62-210.360, F.A.C.: Administrative Permit Corrections.
62-4.150, F.A.C.: Review.	62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-4.160, F.A.C.: Permit Conditions.	62-210.650, F.A.C.: Circumvention.
62-4.210, F.A.C.: Construction Permits	62-210.900, F.A.C.: Forms and Instructions.
62-4.220, F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions	62-210.900(1), F.A.C.: Application for Air Permit - Long Form, Form and Instructions.

List of Applicable Regulations

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96	
62-213.205 F.A.C: Annual Emissions Fee	
62-213.400 F.A.C: Permits and Permit Revisions Required.	
62-213.410 F.A.C: Changes without Permit Revision	
62-213.412 F.A.C: Immediate Implementation Pending Revision Process	
62-213.420 F.A.C: Permit Applications	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
62-213.460, F.A.C.: Permit Shield.	
62-213.900, F.A.C.: Forms and Instructions.	
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions	
CHAPTER 62-296, F.A.C: STATIONARY SOURCES – EMISSIONS STANDARDS, effective 03-13-96.	
62-296.320(2), F.A.C.: Objectionable Odor Prohibited.	
62-296.320(3), F.A.C.: Industrial, Commercial and Municipal Open Burning Prohibited.	
62-296.320(4), F.A.C.: Unconfined Emissions of Particulate Matter.	
62-296.410, F.A.C.: Carbonaceous Fuel Burning Equipment.	

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

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? 006		2. Emission Point Type Code: 3, 4	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): No VE			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: F,V	6. Stack Height: Spray Booth = 27 feet Ovens = 24 feet	7. Exit Diameter: Spray Booths 1-6 = 2.0 feet Spray Booth 7 = 2.5 feet Ovens = 1.3 feet	
8. Exit Temperature: Spray Booths = 77°F Ovens = 125°F	9. Actual Volumetric Flow Rate: (See Field 14) acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: Fugitive Sources = 4 feet	
13. Emission Point UTM Coordinates: Zone: 17 East (km): 436.4 North (km): 3283.4			
14. Emission Point Comment (limit to 200 characters): Spray Booth No. 1 – 26,000 cfm Spray Booth No. 2 – 26,000 cfm Spray Booth No. 3 – 26,000 cfm Spray Booth No. 4 – 26,000 cfm Spray Booth No. 5 – 26,000 cfm Spray Booth No. 6 – 26,000 cfm Spray Booth No. 7 – 13,500 cfm Oven No. 1 – 1,000 cfm Oven No. 2 – 1,000 cfm Oven No. 3 – 750 cfm Oven No. 4 – 750 cfm Oven No. 5 – 750 cfm			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): N/A – Steam heat is generated by Wood Fired Boiler (004).			
2. Source Classification Code (SCC): N/A		3. SCC Units: N/A tons burned	
4. Maximum Hourly Rate: N/A	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A	
7. Maximum % Sulfur: N/A	8. Maximum % Ash: N/A	9. Million Btu per SCC Unit: N/A mmbtu/ton	
10. Segment Comment (limit to 200 characters): N/A			

Segment Description and Rate: Segment N/A of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 			
2. Source Classification Code (SCC):		3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters): 			

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	N/A	N/A	EL
H085	N/A	N/A	NS
H096	N/A	N/A	NS
H115	N/A	N/A	NS
H120	N/A	N/A	NS
H169	N/A	N/A	NS
H186	N/A	N/A	NS

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control: 0
3. Potential Emissions: 385.7 lb/hour 371.55 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 378.30 tons = 756,608.8 lbs 2000: Plant Nos. 1 & 3 combined = 364.79 tons = 729,570.3 lbs Average total VOC Emissions for 1999/2000 = 743,089.6 lbs = 371.55 tons Average hours of operation for 1999/2000 = 1926.5 hrs 371.55 tons / 1926.5 hrs = 0.1929 tons/hr = 385.7 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): VOC emission rates include pollutants which are listed as both VOC and HAP.	

Allowable Emissions Allowable Emissions 1 of 7

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: 8/1/01
3. Requested Allowable Emissions and Units: 371.55 tons/yr	4. Equivalent Allowable Emissions: 385.7 lb/hour 371.55 tons/year
5. Method of Compliance (limit to 60 characters): Tracking of VOC emissions using REGMET 6.0 based on chemical usage.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): N/A	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**(Regulated Emissions Units -****Emissions-Limited and Preconstruction Review Pollutants Only)****Potential/Fugitive Emissions** N/A

1. Pollutant Emitted: H085		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 9.386 lb/hour 9.041 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 9,783.5 lbs + 7,995.7 lbs = 17,779.2 lbs = 8.89 tons 2000: Plant Nos. 1 & 3 combined = 9,610.5 lbs + 8,775.5 lbs = 18,386.0 lbs = 9.19 tons Average H085 emissions for 1999/2000 = 18,082.6 lbs = 9.041 tons Average hours of operation for 1999/2000 = 1926.5 hrs 18,082.6 lbs / 1926.5 hrs = 9.386 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Ethol Benzene included in VOC total.			

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions:	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H096		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 5.544 lb/hour		4. Synthetically Limited? [] 5.341 tons/year	
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 to tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 6,615.0 lbs + 4,731.6 lbs = 11,346.6 lbs = 5.673 tons 2000: Plant Nos. 1 & 3 combined = 5,725.9 lbs + 4,290.2 lbs = 10,016.1 lbs = 5.008 tons Average H096 emissions for 1999/2000 = 10,681.4 lbs = 5.341 tons Average hours of operation for 1999/2000 = 1926.5 hrs 10,681.4 lbs / 1926.5 hrs = 5.544 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Glycol ethers included in VOC total.			

Allowable Emissions Allowable Emissions N/A of

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H115		2. Total Percent Efficiency of Control: N/A	
3. Potential Emissions: 0.9042 lb/hour 0.7000 tons/year		4. Synthetically Limited? <input type="checkbox"/>	
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 100% Emitted Reference:		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 645.1 lbs + 412.3 lbs = 1,057.4 lbs = 0.5287 tons 2000: Plant Nos. 1 & 3 combined = 839.7 lbs + 902.3 lbs = 1,742.0 lbs = 0.8710 tons Average H115 emissions for 1999/2000 = 1,399.7 lbs = 0.7000 tons Average hours of operation for 1999/2000 = 1926.5 hrs 1,742.0 lbs / 1926.5 hrs = 0.9042 lbs/hr			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Methanol included in VOC total.			

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions: lb/hour tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H120	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 0.7266 lb/hour 0.6999 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 407.2 lbs + 431.0 lbs = 838.2 lbs = 0.4191 tons 2000: Plant Nos. 1 & 3 combined = 840.4 lbs + 1,120.8 lbs = 1,961.2 lbs = 0.9806 tons Average H120 emissions for 1999/2000 = 1,399.7 lbs = 0.6999 tons Average hours of operation for 1999/2000 = 1926.5 hrs 1,399.7 lbs / 1926.5 hrs = 0.7266 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Methyl ethyl ketone included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H169	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 17.69 lb/hour 17.04 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 19,686.4 lbs + 15,476.6 lbs = 35,163.0 lbs = 17.58 tons 2000: Plant Nos. 1 & 3 combined = 18,362.5 lbs + 14,616.4 lbs = 32,978.9 lbs = 16.49 tons Average H169 emissions for 1999/2000 = 34,071.0 lbs = 17.04 tons Average hours of operation for 1999/2000 = 1926.5 hrs 34,071.0 lbs / 1926.5 hrs = 17.69 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Toluene included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A

1. Pollutant Emitted: H186	2. Total Percent Efficiency of Control: N/A
3. Potential Emissions: 40.48 lb/hour 38.99 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: N/A [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 100% Emitted Reference:	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 1999: Plant Nos. 1 & 3 combined = 41,942.7 lbs + 34,605.1 lbs = 76,547.8 lbs = 38.27 tons 2000: Plant Nos. 1 & 3 combined = 41,351.2 lbs + 38,064.1 lbs = 79,415.3 lbs = 39.71 tons Average H186 emissions for 1999/2000 = 77,981.6 lbs = 38.99 tons Average hours of operation for 1999/2000 = 1926.5 hrs 77,981.6 lbs / 1926.5 hrs = 40.48 lbs/hr	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Xylones included in VOC total.	

Allowable Emissions Allowable Emissions N/A of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation N/A of _____

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

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor N/A of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: Model Number:	
5. Installation Date:	Serial Number: 6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

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

Supplemental Requirements

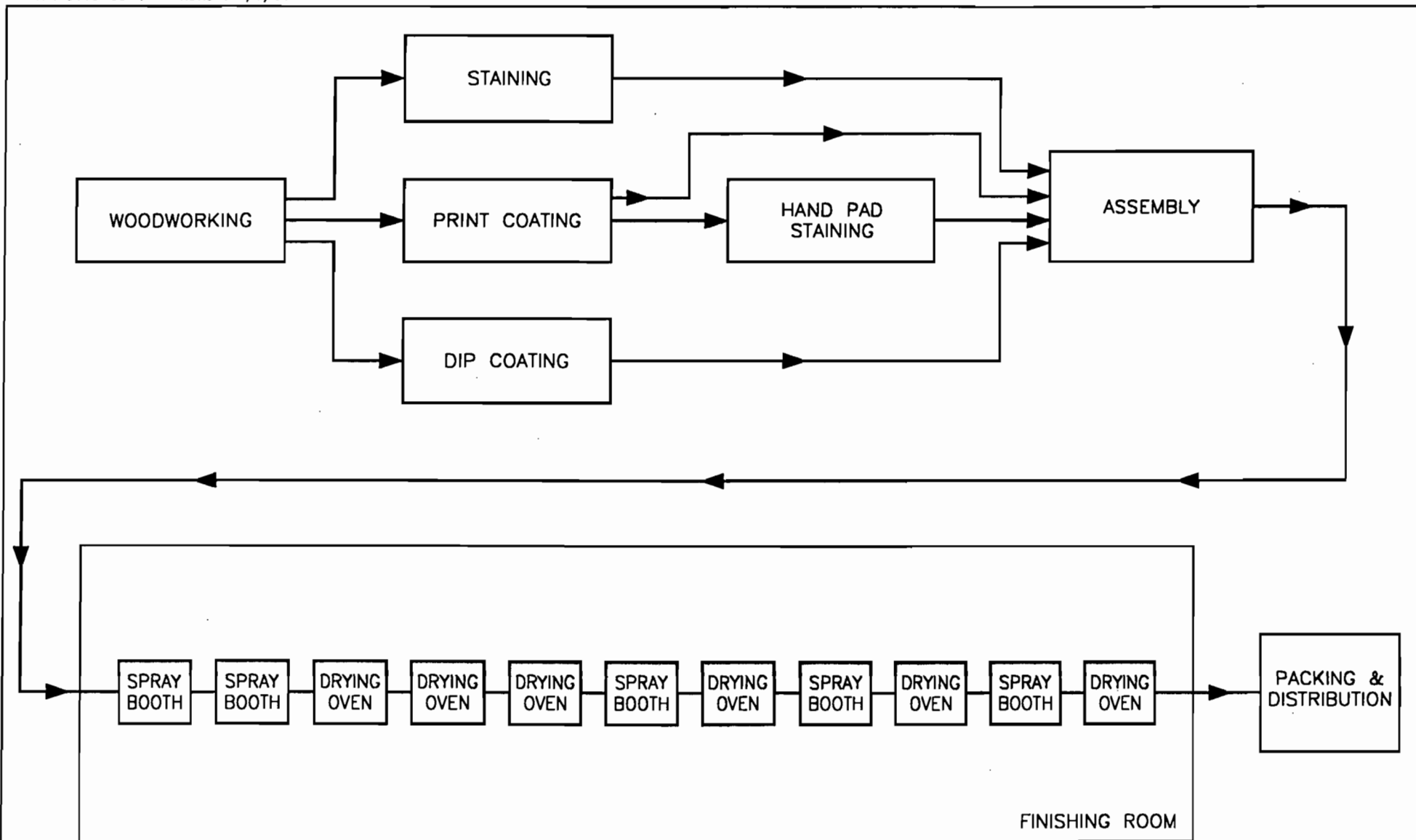
1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>3H</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: <div style="text-align: center;">N/A</div>

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EXHIBIT 3H

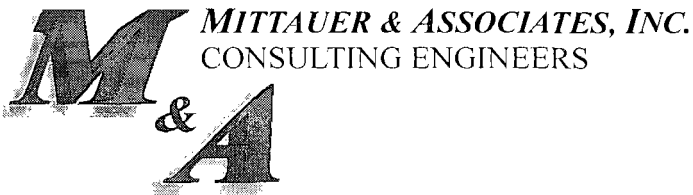
Finish Coating Operations Flow Diagram



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

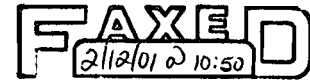
Finish Coating Operations Flow Diagram
Florida Furniture Industries, Inc.
Plant No.3, Document ID: 3H
Palatka, Florida



4611-4 U.S. Highway 17
Orange Park, Florida 32003
Office: (904) 278-0030
Fax: (904) 278-0840

RECEIVED

FEB 13 2001



February 12, 2001

BUREAU OF AIR REGULATION

VIA FAX: (850) 922-6979

A. A. Linero, P.E., Administrator
New Source Review Section
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Request for PSD Applicability Determination
PSD Permitting
Florida Furniture Industries
Mittauer & Associates, Inc. Project No. 9110-08-1

Dear Mr. Linero:

Florida Furniture Industries, Inc. (FFI) is requesting a PSD Applicability Determination for the two facilities it owns and operates in Palatka, Florida. In order for FFI to stay in business and allow 420 people to keep their jobs, the painting operations at Plant No. 1 must be shut down and shifted to Plant No. 3 on or before March 5, 2001. 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. In the year 2000, a total of 192.1 tons of VOC's were emitted at Plant No. 1 while 172.7 tons of VOC's were emitted at Plant No. 3. Plant No. 1 is not subject to PSD requirements because it has been in operation as a wood furniture manufacturing facility since 1934.

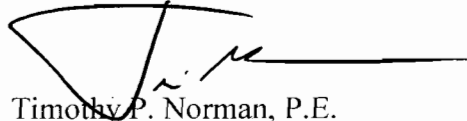
The dry kilns, boiler, and some woodworking operations would continue at Plant No. 1. The materials produced at Plant No. 1 would be trucked daily to Plant No. 3 for finishing, packing, and distribution. Plant No. 1 and Plant No. 3 would continue to share a common switchboard, administrative functions, etc. An exhibit showing the location of the two facilities is attached.

We would like to emphasize that FFI's economic survival hinges on being able to consolidate its painting/coating operations at Plant No. 3. FFI is not currently in a financial condition where it can spend large sums of money on VOC control equipment and their associated O&M costs.

A.A. Linero, P.E., Administrator
February 12, 2001
Page 2

We would appreciate a response as soon as possible. Contact me if you have any questions.

Sincerely,
Mittauer & Associates, Inc.

A handwritten signature in black ink, appearing to read 'Timothy P. Norman', with a long horizontal line extending to the right.

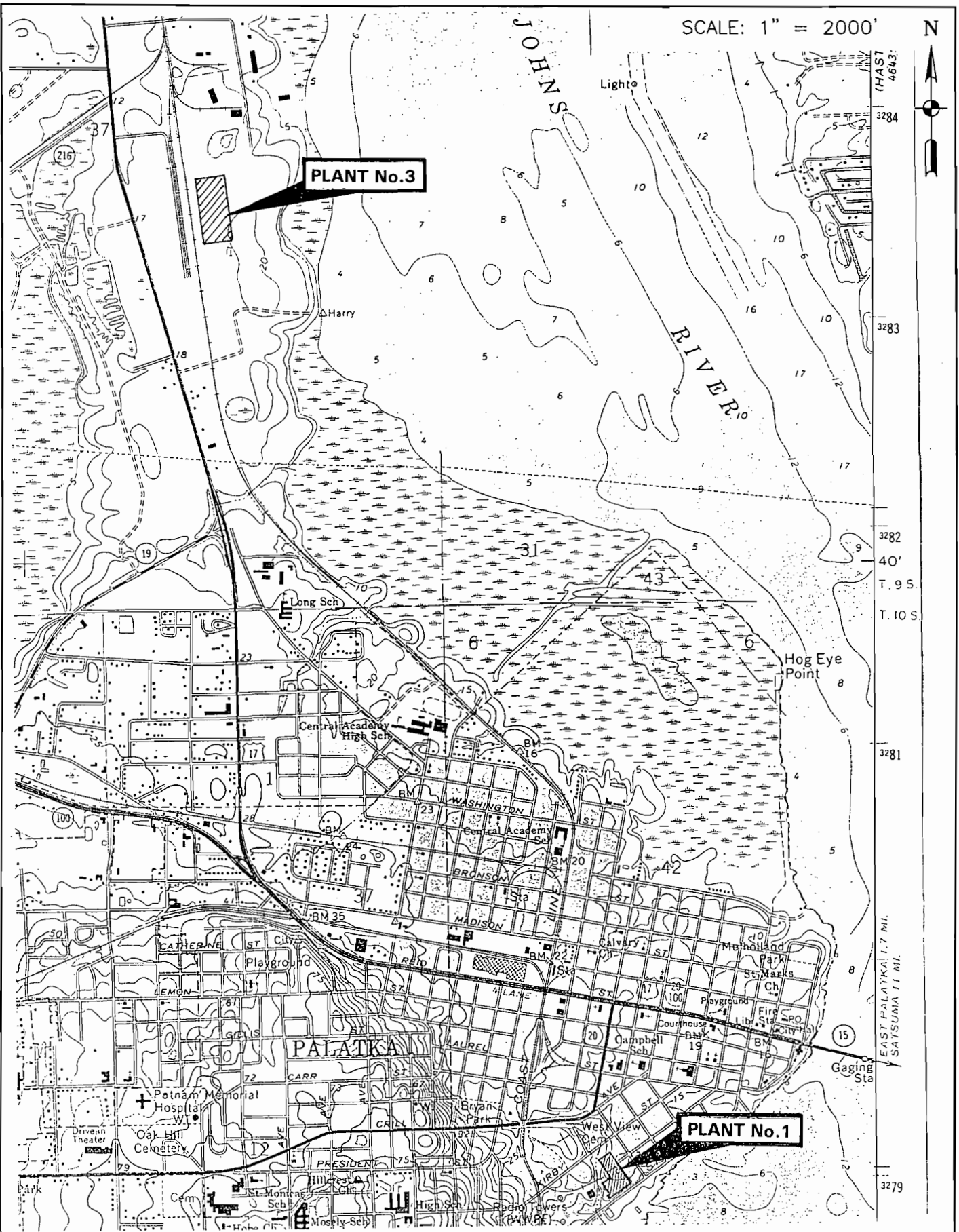
Timothy P. Norman, P.E.
Manager of Environmental Services

TPN/bb
Enclosure

cc/enc: Florida Furniture

SCALE: 1" = 2000'

N



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florida (904) 278-0030

FLORIDA FURNITURE INDUSTRIES, INC.
Air Permitting
Facility Location Map
Putnam County, Florida

Job No. 9110-08-1 2/12/01