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 Service Mittauer & Associates, Inc. 4611-4 U.S. Highway 17 Orange Park, FL 32003	C. Signature  X Buth Brown   Agent   Addressee   D. Is delivery address different from item 1?   Yes   YeS, enter delivery address below:   No  SS  3. Service Type   Descripted Mail   Express Mail   Registered   Return Receipt for Merchandise
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	) Box No. I.S. Highway 1	7
City, State, ZIP+4	ark, FL 32003	

#### 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 advertisment:

Legal Number:75,019
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.

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, Notary Public, State of Florida



Notary Seal of Office:

x\_\_ Personally known to me, or

Produced identiciation:

x Did take an

6/7/01

PUBLIC NOTICE
PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA DEPARTMENT OF ENVIRON-MENTAL 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), Furniture Industries (FFI), Inc., for consolidation of Plant No. 1 and Plant No. 3 as a sin-gle 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 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 com-fort Road in Palatka. UTM coordinates for Plant 1: Zone 17, 438.3 km east and 3278.9 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 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 ployethylene-paper filters for reducing spraying emis-sions. 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 written comments and

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

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.559 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 120.559 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 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 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 of file a petition within the appriorate time period shall

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 filling 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 telepho 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 pro-posed action; (d) A statem 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 state-ment of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (q) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take es 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 dis-pute 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 filling 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:

constitute a waiver of that

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 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, Sulte 4, Tallahassee, Florida, 32301, or call 850/488-0114, for additional information.

Legal No. 75019 6/11/01

SENDER: COMPLETE THIS SECTION		COMPLETE THIS S	ECTION ON DEL	IVERY
<ul> <li>Complete items 1, 2, and 3. Also comitem 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reso that we can return the card to you.</li> <li>Attach this card to the back of the major on the front if space permits.</li> </ul>	verse	A, Received by (Plaa C. Signature	Johnson Dehler	B. Date of Delivery  Agent  Addressee
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Mr. William A. Cratch Florida Furniture Industr PO Box 610 Palatka, FL 32178	ries, In			
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7000	Street, Apt., No.; or PO Box No. PO Box 610					
CityPatatka, FL 32178						
	PS Form 3800 February 2000 See Reverse for Instructions					

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Mr. William A. Cratch Vice President/Operation Florida Furnityre Indust P. O. Box 610	ns	JUN OR PRINT	
Palatka, FL 32178	3. Service T  Â☐ Certifie ☐ Regist ☐ Insure	d Mail	for Merchandise
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Florida Fur Street, Apt. No. or PO B P. O. Box 6	nitureIndus 10	tries		
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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.

Tiprothy P. Norman, P.E.

Manager of Environmental Services

TPN/bb

cc: Florida Furniture



# Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400 July 17, 2001

David B. Struhs Secretary

# 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	СОМР	LETE THIS SE	CTION ON DELI	VERY
<ul> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reso that we can return the card to you.</li> </ul>	verse C Sign	DEAN B	se Print Clearly)	B. Date of Delivery
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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



4611-4 U.S. Highway 17 Orange Park, Florida 32003

Office: (904) 278-0030 Fax: (904) 278-0840

June 14, 2001

JUN 1 8 2001
BUREAU OF AIR REQULATION

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

ec: g. Reynolds C. Karts, NED

## STATE OF FLORIDA §

8

#### 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 advertisment:

Legal Number:75,019
PUBLIC NOTICEPUBLIC 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.

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, Notary Public, State of Florida

Notary Seal of Office: MARY KAYE WELLS
MY COMMISSION # CC 857333
EXPIRES: July 22, 2003
Bonded Thru Notary Public Underwriters

x\_\_ Personally known to me, or

\_\_ Produced identiciation:

x Did take an

6/7/01

PUBLIC NOTICE
PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUC-

EPARTMENT OF ENVIRON-MENTAL PROTECTION

DRAFT Permit No. : 01070026-003-AC Florida Furniture Industries,

Wood Furniture
Manufacturing Facility
Consolidation of Plant No. 1
and Plant No. 3
Palatka, Putnam County

ne Department of vironmental Protection epartment) gives notice of intent to Issue an air contruction permit to Florida uniture industries (FFI), c., for consolidation of Plant 0. 1 and Plant No. 3 as a sine facility. Plant No. 1 is cated at 722 River Street; lant No. 3 is located at 150 omfort Road, Palatka, utnam County. A Best valiable Control Technology (ACT) determination was not valiable Control Technology (ACT) determination was not recommended to the control Technology (ACT) determination was not orida Furniture Industries, inc., Post Offica Box 610, alatka, Florida S2178. lorida Furniture Industries FFI) owns and operates two rood furniture manufacturing idants iocated approximately .75 miles apart in Palatka, vintama County. Plant 1 is coated at 160 comort Road in Palatka. UTM cordinates for Plant 1: Zone 17, 436.4 km East and 1283.4 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 on increase in total emissions over current emission levels. Emissions sources include wood working areas, finish on increase in total emissions over current emission levels. Emissions sources of culture on per year (TPY) by limiting the annual operation to 2,450 hours and establishing limits on volatile components of coatings and solvents. Emissions sources include components of coatings and solvents. Emissions sources include wood working dust emissions and ployethylene-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 unless a response received in accordance with the conditions of the Martin Permit unless a response received in accordance with the conditions of the original conditions.

tions.
The Department will accept written comments and requests for public meetings concerning the proposed DRAFT Permit Issuance action for a period of 14 (four teen) 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 Statton #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a sinificant change in the proposed agency action, the proposed permit and require it 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 proceed-

ing 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, Tallahssee, Fiorida 32399-3000. Petitions must 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 120.50(3) of the Florida Statutes must be filed within fourteen days of receipt of the notice within fourteen days of receipt of this notice, whichever occurs first. Unde section 120.50(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, regarcless of the date of publication. A petitioner shall mail 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

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. 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 Code 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 known' (b) The name, petitioner to relief; (f) A statepetitioner 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 pue 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 pute the material facts upon substantial interests will be affected by any such final decision of the Department on the application have the 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:

constitute a waiver of that

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

Dept. of Environmental Protection Northeast District Office 7825 Baymeadows Way, Suite 220B Jacksonville, Florida 32256-7590 7990 Telephone: 904/448-4300 Fax: 904/448-4363

Dept. of Environmental Protection Northeast District Branch Office 011 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 such section. tial records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolla Drive, Suite 4, Tallahassee, Florida, 32301, or call 850/488-0114, for addi-tional 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/c 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.

Charlatte Jages 7/9/0/
(Clerk) (Date)



# Department of Environmental Protection

Jeb Bush Governor 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 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.

#### **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 Rackage Mailed June 4, 2001
- Proof of Publication Received June 18, 2001
- Final Permit Issued July 9, 2001

## SECTION II – ADMINISTRATIVE REQUIREMENTS

- 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.
- 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. <u>General Conditions</u>: 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. <u>Terminology</u>: 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. <u>Modifications</u>: 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. <u>Permit Expiration Date</u>: The permit expiration date of December 31, 2001 will allow time for submittal of a new Title V permit application to the Department.
- 9. <u>Permit Expiration Date Extension</u>: 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. <u>BACT Determination</u>: 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. <u>Application for Title V Permit</u>: 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. <u>Circumvention</u>: 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. <u>Unconfined Particulate Matter Emissions</u>: 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. <u>Test Notification</u>: 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. <u>Calculation of Emission Rate</u>: 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

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. <u>Stack Testing Facilities</u>: 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. <u>Annual Operating Reports</u>: 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 steamheated ovens in the Finishing Room.
005	#3 Wood-waste Boiler	Wood-burning boiler fed by wood chips and sawdust. Boiler provides steam for drying ovens in the finish coating operations and for space heating.
006	# 3 Wood Working Area	Dust collection unit (Bag filters A, B, C and D). Chip Cyclone separates wood chips from the wood hog chipping operation.

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

## **EMISSION LIMITATIONS**

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

# **VOLATILE ORGANIC COMPOUNDS (VOC)**

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

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

FINISH COATING OPERATIONS

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

<sup>&</sup>lt;sup>a</sup> Thinners have zero solids, therefore the lb VHAP/lb solids number is meaningless.

b. Strippable Spray Booth Cleaning Operations

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

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

#### OPERATIONAL LIMITATIONS

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

# WORK PRACTICE STANDARDS

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

- 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

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 extend 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**

BAR

TO:

Howard Rhodes

THRU:

Clair Fancy/Al Linero

FROM:

John Reynolds

DATE:

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 repermitted 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 THIS SECTION ON DELIVERY ■ Complete items 1, 2, and 3. Also complete A. Received by (Please Print Clearly) B. Date of Delivery item 4 if Restricted Delivery is desired. enda i Print your name and address on the reverse C. Signature so that we can return the card to you. Attach this card to the back of the mailpiece, □ Agent or on the front if space permits. Addressee ☐ Yes D. Is delivery adj 1. Article Addressed to: If YES, enter delivery address below □ No Mr. William A. Cratch Florida Furniture Industries, Inc. PO Box 610 Palatka, FL 32178 3. Service Type Certified Mail ☐ Express Mail ☐ Return Receipt for Merchandise ☐ Registered ☐ Insured Mail ☐ C.O.D. 4. Restricted Delivery? (Extra Fee) ☐ Yes 2. Article Number (Copy from service label) 7000 0600 0026 4129 8351 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)					
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	Restricted Delivery Fee (Endorsement Required)					
	Total Postage & Fees	\$				
06		e Print Clearly) (to be comp nm A. Cratch	pleted by mailer)			
000	Street Apt No.; or POB. PO Box 610	ox No.				
70	<sup>City</sup> ,Patatka, F	L 32178				
	PS Form 3800, February 2	2000	See Reverse for Instructions			



# Department of Environmental Protection

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

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

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

Sincerely,

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

CHF/jr

**Enclosures** 

In the Matter of an Application for Permit by:

Florida Furniture Industries, Inc. Post Office Box 610 Palatka, Florida 32178 DRAFT Permit No.: 1070026-003-AC Wood Furniture Manufacturing Facility Plant Consolidation Putnam County

# INTENT TO ISSUE AIR CONSTRUCTION PERMIT

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

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

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

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

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

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of <u>Public Notice of Intent to Issue Air Construction Permit</u>. 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

Draft Permit No.: 1070026-003-AC

Page 2 of 3

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

Draft Permit No.: 1070026-003-AC

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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 6/4/6/ 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.

Charlatte Hayes 6/4/0/ (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 PUBLICATION 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

# 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 repermitted 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:

- a. 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.
- b. 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.
- c. Wood dust from the woodworking operations is pneumatically conveyed to the wood dust storage house via a closed loop system. Air is cleaned by bag filters prior to being discharged to the atmosphere. Collected wood dust is utilized to fire the steam boiler. The only emissions from the Bag Filters are PM/PM<sub>10</sub>.

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 multicyclone fly ash arrestor and a fly ash re-injection system. The boilers have the potential to emit carbon monoxide (CO), nitrogen oxides (NOx), 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.

- 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

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

"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 interrelationships 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

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. <u>CONCLUSION</u>

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



# Department of Environmental Protection

Jeb Bush Governor 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"



#### **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-	Wood-burning boiler fed by wood chips and sawdust. Boiler provides steam for	
	waste Boiler	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-



#### **SECTION II – ADMINISTRATIVE REQUIREMENTS**

- 1. <u>Permitting Authority:</u> 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. <u>Compliance Authority:</u> All documents related to operation, reports, tests, and notifications should be submitted to the DEP Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590, phone 904/448-4300 and Northeast District Branch Office, 101 NW 75<sup>th</sup> Street, Suite 3, Gainesville, Florida, phone 352/333-2850.
- 3. <u>General Conditions</u>: 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. <u>Terminology</u>: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- 5. <u>Forms and Application Procedures</u>: 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. <u>Completion of Construction</u>: 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. <u>Permit Expiration Date Extension</u>: 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. <u>BACT Determination</u>: 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. <u>Application for Title V Permit</u>: 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. <u>Circumvention</u>: 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. <u>Unconfined Particulate Matter Emissions</u>: 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. <u>Test Notification</u>: 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. <u>Calculation of Emission Rate</u>: 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 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. <u>Stack Testing Facilities</u>: 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. <u>Annual Operating Reports</u>: 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. <u>Regulations</u>: 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 steamheated 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	OPER	ATIONS

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

<sup>&</sup>lt;sup>a</sup> Thinners have zero solids, therefore the lb VHAP/lb solids number is meaningless.

b. Strippable Spray Booth Cleaning Operations

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

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

#### **OPERATIONAL LIMITATIONS**

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

#### WORK PRACTICE STANDARDS

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



- 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 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 extend 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.



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,

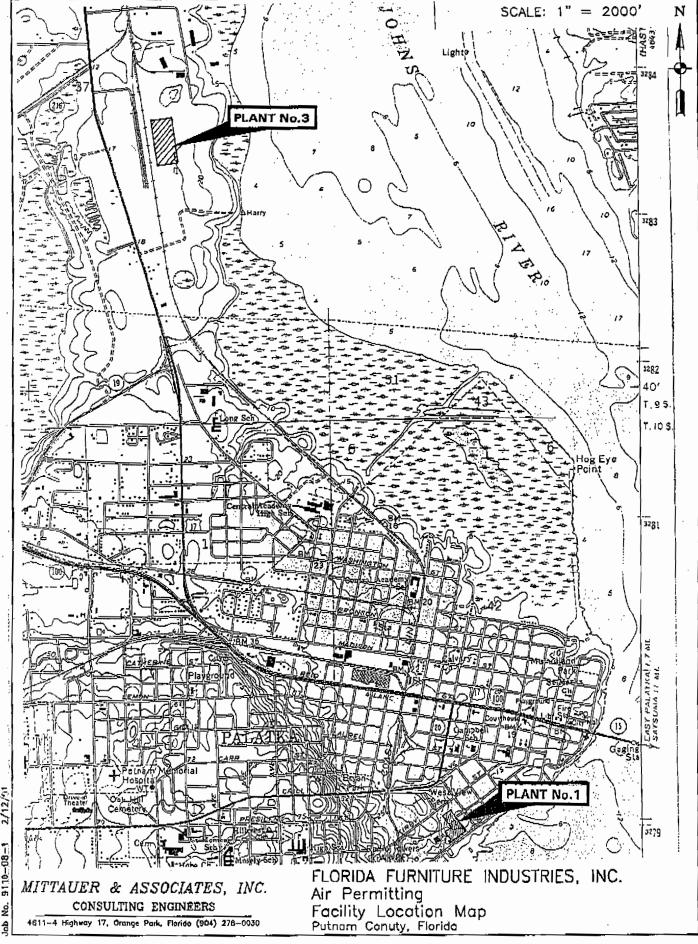
Mittauer & Associates, Inc.

Timothy P. Norman, P.E.

Manager of Environmental Services

TPN/bb Enclosure

cc/enc: Florida Furniture



9110-08-1

# Florida Department of Environmental Protection

Memorandum

TO:

Clair Fancy

THRU:

Al Linero

FROM:

John Reynolds (1)

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 THIS SECTION ON DELIVERY
<ul> <li>Complete items 1, 2, and 3. Also complement 4 if Restricted Delivery is desired. In the your name and address on the revisor that we can return the card to you.</li> <li>Attach this card to the back of the mails or on the front if space permits.</li> </ul>	erse C. Signature  Agent Addressee
Article Addressed to:	If VES control delivery address below:
Mr. William A. Cratch Vice President/Operation Florida Furnityre Indust P. O. Box 610	
Palatka, FL 32178	3. Service Type
•	
	4. Restricted Delivery? (Extra Fee)
2. Article Number (Copy from service label) 7000 0600 0026 4129 8658	
PS Form 3811, July 1999	Domestic Return Receipt 102595-99-M-1789

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided) 少·传统。在100gg 200gg 9 6 Mr. William A.Cratch 41,29 S Postage Certified Fee Postmark Return Receipt Fee (Endorsement Required) Here 0026 Restricted Delivery Fee (Endorsement Required) Total Postage & Fees \$ Recipient's Name (Please Print Clearly) (to be completed by mailer) Florida Furniture Industries 7000 City, State. ZIP+4 Palatka, FL 32178 :PS Form 3800, February 2000 . 1



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.

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**

identification of Facility					
1.	1. Facility Owner/Company Name: Florida Furniture Industries, Inc.				
2.	2. Site Name: Plant No. 1 and Plant No. 3				
3.	Facility Identification Number: 1	070002 ส	and 1070026	[ ] Unknown	
4.	Facility Location:	100 D.	G. (DI AN	1) 1160 C C ( D 1	
 (Pl:	Street Address or Other Locator: 7 ant No. 3)	/22 Kiver	Street (Plant No.	1) and 160 Comfort Road	
(2.2)	,	County: I	Putnam	Zip Code: 32177	
5.	Relocatable Facility?		6. Existing Per	mitted Facility?	
	[ ] Yes [X ] No		[X] Yes	[ ] No	
<u>Ap</u>	plication Contact				
	1. Name and Title of Application Contact: Timothy P. Norman, P.E., Manager of Environmental Services				
2.	2. Application Contact Mailing Address: Organization/Firm: Mittauer & Associates, Inc.				
	Street Address: 4611-4 U.S. Highway 17				
	City: Orange Park	Sta	ate: FL	Zip Code: 32003	
3.	Application Contact Telephone Nu	ımbers:			
	Telephone: (904) 278-0030 Fax: (904) 278-0840				
<u>Ap</u>	Application Processing Information (DEP Use)				
1.	Date of Receipt of Application:				
2.	Permit Number:				
3.	3. PSD Number (if applicable):				
4.	4. Siting Number (if applicable):				

DEP Form No. 62-210.900(1) - Form

# **Purpose of Application**

# Air Operation Permit Application

Th	is	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:
[X	]	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:
[	j	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:
Ai	r (	Construction Permit Application N/A
Th	is	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.
Γ	1	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:
W	illiam 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, 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, offany permitted emissions unit.

Signature

Date

# <u>Professional Engineer Certification</u>

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

DEP Form No. 62-210.900(1) - Form

<sup>\*</sup> Attach letter of authorization if not currently on file.

### 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.

Ja-	3/14/01
Signature	Date
(seal) #0. 41128	

DEP Form No. 62-210.900(1) - Form

<sup>\*</sup> 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**

heck 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			·
			•
			·
		·	

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

## II. FACILITY INFORMATION

#### A. GENERAL FACILITY INFORMATION

# Facility Location and Type

1.	Facility UTM Coor	dinates:	· ·	
	Zone: 17	East (km):	438.3 Nort	h (km): 3278.9 (Plant No. 1)
	Zone: 17	East (km): 436.4 Nort		th (km): 3283.4 (Plant No. 3)
2.	Facility Latitude/Lo Latitude (DD/MM/S		ongitude (DD/MM/SS):	81°–38'– 5" W (Plant No. 1)
	Latitude (DD/MM/S	SS): 29°–40'–50" N L	ongitude (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

City: Palatka

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)

State: FL

Zip Code: 32178

3. Facility Contact Telephone Numbers:

Telephone: (904) 328-3444 Fax: (904) 328-5455

DEP Form No. 62-210.900(1) - Form

# **Facility Regulatory Classifications**

# Check all that apply:

1.	[ ] Small Business Stationary Source?	[	] Unknown
2.	[X] Major Source of Pollutants Other than Hazardous Air P	ollu	utants (HAPs)?
3.	[ ] Synthetic Minor Source of Pollutants Other than HAP:	s?	
4.	[X ] Major Source of Hazardous Air Pollutants (HAPs)?		
5.	[ ] Synthetic Minor Source of HAPs?		
6.	[ ] One or More Emissions Units Subject to NSPS?		
7.	[ ] One or More Emission Units Subject to NESHAP?		
8.	[X ] Title V Source by EPA Designation?		
9.	Facility Regulatory Classifications Comment (limit to 200 c	hara	acters):
	ours of operation of the finish coating operations are restricted aintain total VOC emissions to less than 371.55 TPY.	l to	<u>1926.5</u> hours/year to

# List of Applicable Regulations

	T
40 CFR 61: National Emission Standards for	CHAPTER 62-103, F.A.C.: RULES OF
Hazardous Air Pollutants (NESHAP).	ADMINISTRATIVE PROCEDURE,
	effective 12-31-95
40 CFR 82: Protection of Stratospheric	62-103.150, F.A.C.: Public Notice of
Ozone.	Application and proposed Agency Action.
40 CFR 82, Subpart F: Recycling and	62-103.155, F.A.C.: Petition for
Emission Reduction.	Administrative Hearing; Waiver of Right to
	Administrative Proceeding.
CHAPTER 62-4, F.A.C.: PERMITS,	CHAPTER 62-210, F.A.C.: STATIONARY
effective 10-16-95.	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	62-210.300(2), F.A.C.: Air Operation Permits.
Permits; Application.	
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	62-210.300(3)(a), F.A.C.: Full Exemptions.
Denying Permits; Issuance; Denial.	_

DEP Form No. 62-210.900(1) - Form

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.	

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

# **B. FACILITY POLLUTANTS**

# **List of Pollutants Emitted**

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

DEP Form No. 62-210.900(1) - Form

# C. FACILITY SUPPLEMENTAL INFORMATION

# **Supplemental Requirements**

1.	Area Map Showing Facility Location: [X ] Attached, Document ID: 1A3A [ ] Not Applicable [ ] Waiver Requested
2.	Facility Plot Plan: [X ] Attached, Document ID: 1B & 3B [ ] Not Applicable [ ] Waiver Requested
3.	Process Flow Diagram(s): [X] Attached, Document ID: 1C &3C [ ] Not Applicable [ ] Waiver Requested
	Precautions to Prevent Emissions of Unconfined Particulate Matter:  [X] Attached, Document ID: 1D &3D [ ] Not Applicable [ ] Waiver Requested 1E &3E
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
•	
	,

11

DEP Form No. 62-210.900(1) - Form

# Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
[ ] Attached, Document ID: [X] Not Applicable
9. List of Equipment/Activities Regulated under Title VI:
[ ] Attached, Document ID:
[ ] Equipment/Activities On site but Not Required to be Individually Listed
[X] Not Applicable
10. Alternative Mathada of Operations
10. Alternative Methods of Operation:  [ ] Attached Document ID: [X] Not Applicable
[ ] Attached, Document ID: [X] Not Applicable
11. Alternative Modes of Operation (Emissions Trading):
[ ] Attached, Document ID: [X] Not Applicable
[ ] Tituelled, Boedinent ib [11] Trot spinotes
12. Identification of Additional Applicable Requirements:
[ ] Attached, Document ID: [X] Not Applicable
13. Risk Management Plan Verification:
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:)
[ ] Plan to be submitted to CEPPO (Date required:)
[X] Not Applicable
14. Compliance Report and Plan:
[ ] Attached, Document ID: [X] Not Applicable
· · · · · · · · · · · · · · · · · · ·
15. Compliance Certification (Hard-copy Required):
[ ] Attached, Document ID: [X] Not Applicable

12

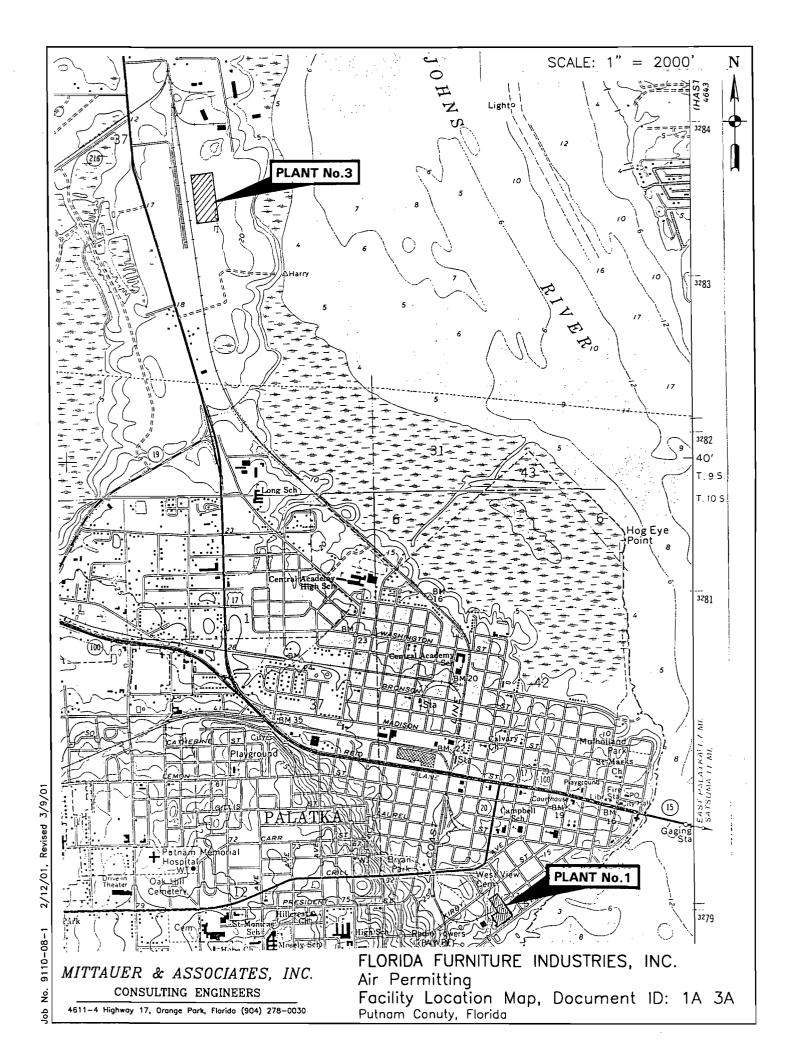
# **EXHIBITS 1A 3A**

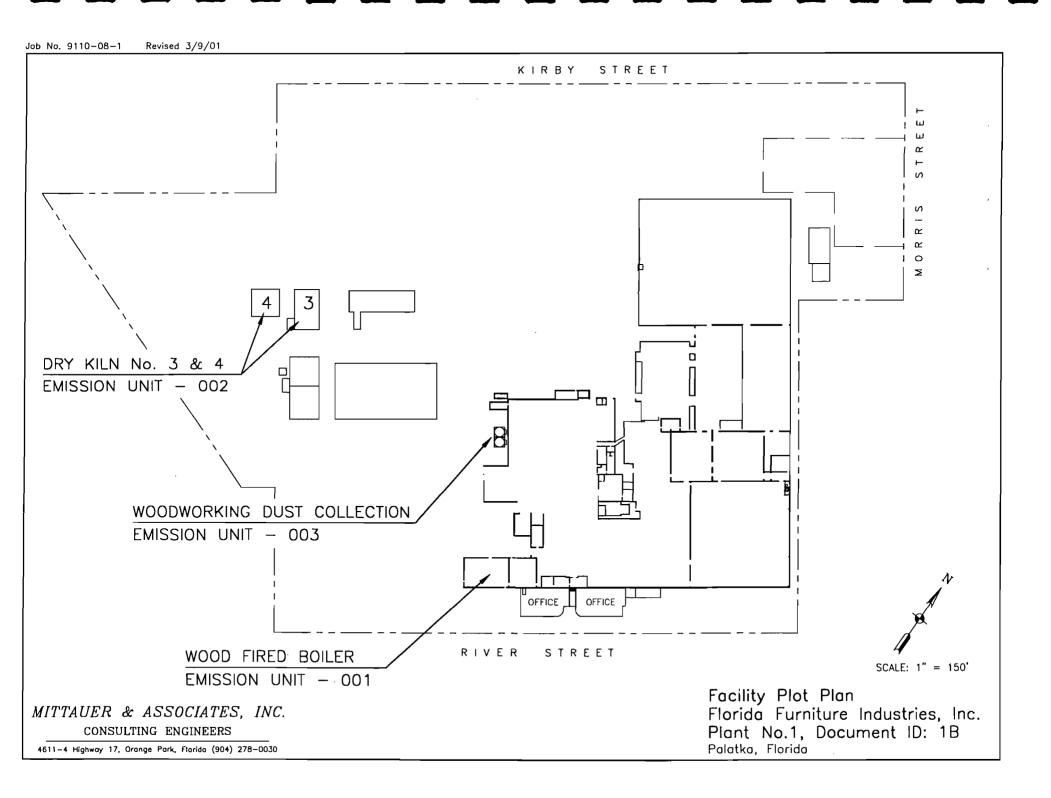
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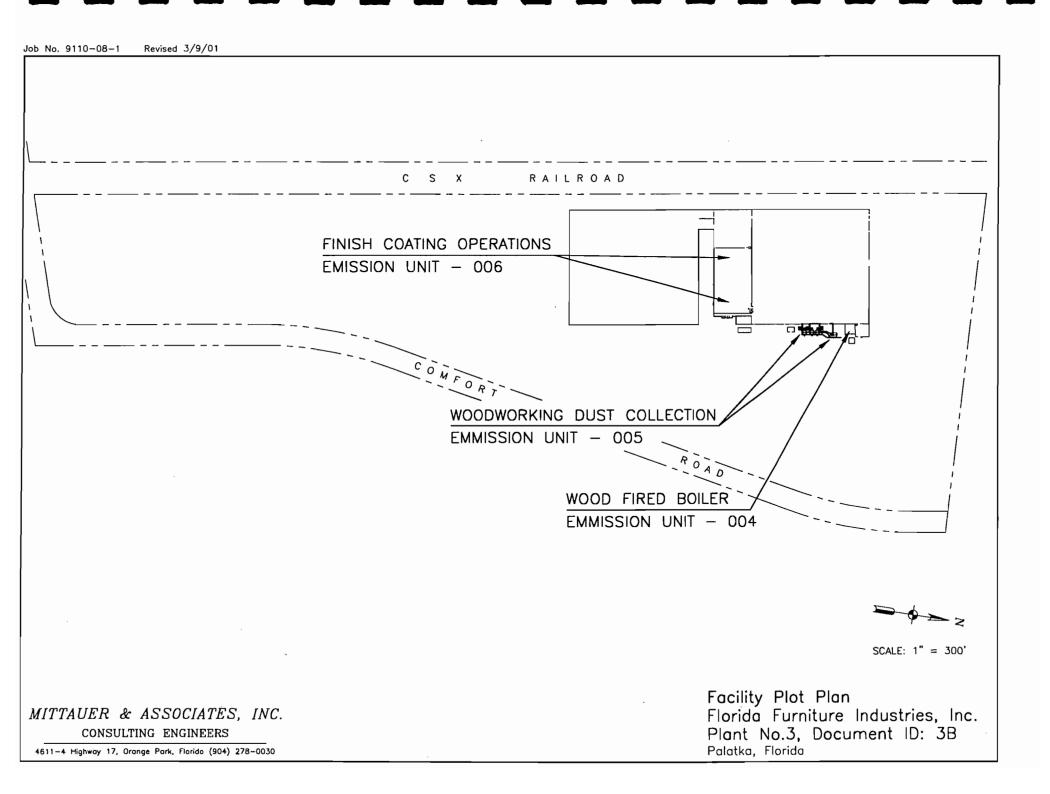
1C, 3C

1D, 3D

1E, 3E







MITTAUER & ASSOCIATES, INC. CONSULTING ENGINEERS

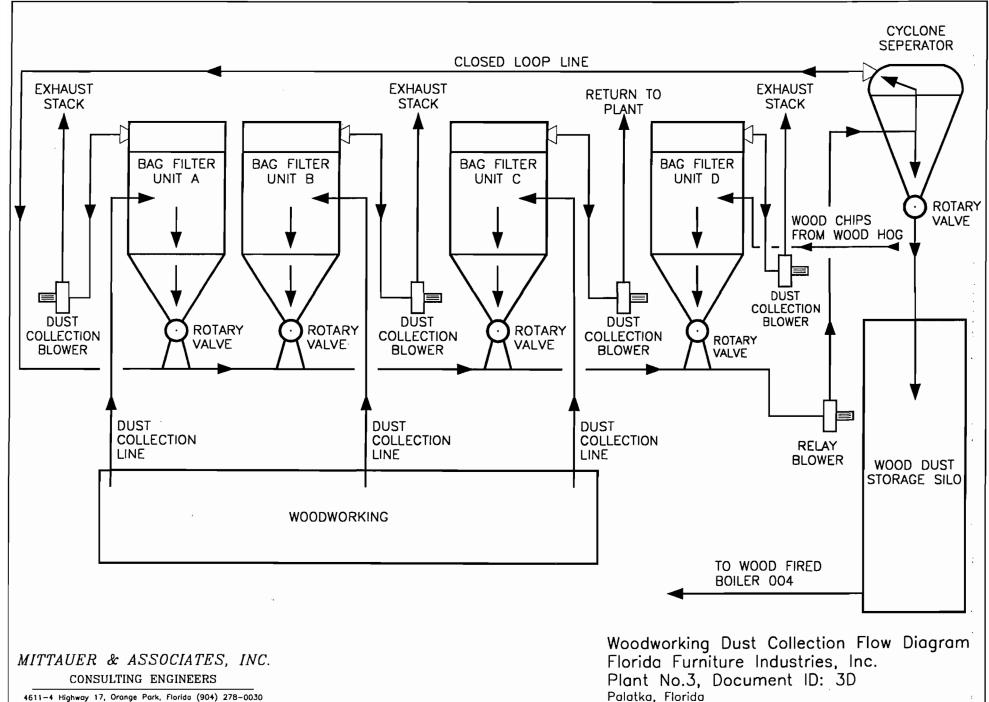
4611-4 Highway 17, Orange Park, Florido (904) 278-0030

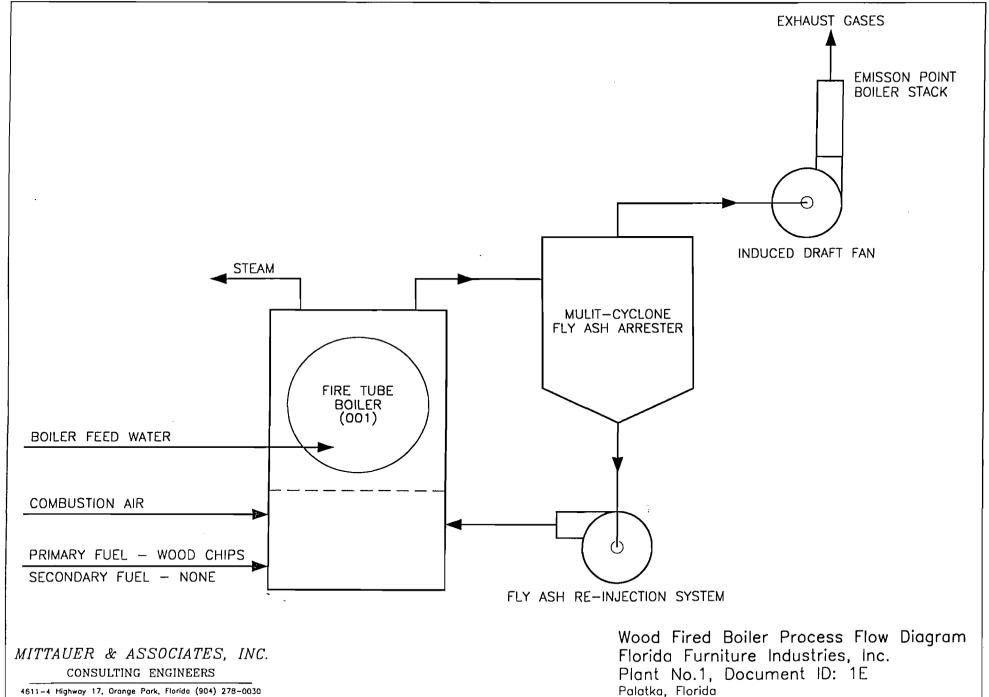
Facility Flow Diagram
Florida Furniture Industries, Inc.
Plant No.1, Document ID: 1C
Palatka, Florida

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.1, Document ID: 1D
Palatka, Florida





<b>Emissions</b>	Unit !	Information	Section	1	of	<u>.6</u> ·	_

#### 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**

<u> </u>						
1. Type of Emission	ons Unit Addressed in Thi	s Section: (Check one)				
process or pro	[X] 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).					
process or pro		n addresses, as a single emis es which has at least one defin gitive emissions.				
		n addresses, as a single emis s which produce fugitive em				
2. Regulated or Ur	regulated Emissions Unit	? (Check one)	<u> </u>			
[X] The emissions uni		ssions Unit Information Secti	on is a regulated			
[ ] The emissions emissions uni		nissions Unit Information Sec	ction is an unregulated			
3. Description of F	Emissions Unit Addressed	in This Section (limit to 60 c	characters):			
Wood fired boiler a	t Plant No. 1		·			
4. Emissions Unit	Identification Number:		[ ] No ID			
ID: 001	·	[ ] ID U	Jnknown			
5. Emissions Unit Status Code:	6. Initial Startup Date: 1963	7. Emissions Unit Major Group SIC Code: 2511	8. Acid Rain Unit?			
9. Emissions Unit	Comment: (Limit to 500 C	Characters)				
Boiler provides stea facility.	m to Plant No. 1 for heati	ng of dry kilns and for heatir	ng of the manufacturing			

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Emissions Unit Information Section 1 of 6
Emissions Unit Control Equipment
1. Control Equipment/Method Description (Limit to 200 characters per device or method):
Wood burning boiler fed with wood chips and sawdust with multicyclone fly ash arrestor and fly ash re-injection system.

## **Emissions Unit Details**

2. Control Device or Method Code(s): 077

1.	Package Unit:		
	Manufacturer: The Bigelow Company	Model Number: HRT	
2.	Generator Nameplate Rating: N/A	MW	
3.	Incinerator Information: N/A		
	Dwell Temperature:	°F	
	Dwell Time:	seconds	ı
	Incinerator Afterburner Temperature:	°F	

<b>Emissions Unit Information Section</b>	. 1		of	6	ι.	
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## **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 Throughp	out Rate: 1,96	00 lb/hr	23.52 ton/day
4.	Maximum Production Rate: N	/A		
5.	Requested Maximum Operating	g Schedule:		
		24 hours/da	ny	7 days/week
		52 weeks/y	ear	8,760 hours/year
6.	Operating Capacity/Schedule C	Comment (lim	it to 200 char	acters):
Th	roughput based on current permi	itted rate.		

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# 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.

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<b>Emissions Unit Information Section</b>	,	1	of	6	
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## **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.	

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<b>Emissions</b>	Unit In	<b>iformation</b>	Section	1	of <u></u>

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

## **Emission Point Description and Type**

1.	Identification of Point on Pl Flow Diagram? 001	ot Plan or	2. Emission Point Type Code:					
3.	Descriptions of Emission Po 100 characters per point):	oints Comprising	g this Emissions (	Jnit for VE Tracking (	(limit to			
Во	Boiler stack.							
4.	ID Numbers or Descriptions	s of Emission Ur	nits with this Emi	ssion Point in Commo	n:			
N/.	Α							
5.	Discharge Type Code: V	6. Stack Heigh	ht: 50 feet	7. Exit Diameter: 3.2	2 feet			
8.	Exit Temperature: 491 °F	9. Actual Vol Rate:	umetric Flow 6,600 acfm	10. Water Vapor: N/A	%			
11	. Maximum Dry Standard Flo N/A	ow Rate: dscfm	12. Nonstack Er	mission Point Height: N/A	feet			
13.	Emission Point UTM Coord	linates:						
		ast (km): 438.3		h (km): 3278.9				
14.	Emission Point Comment (1	imit to 200 char	acters):					
N/.	A				,			

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Emissions Unit Information Section	_1	of	6	. 2.50
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# E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segment Description and Ra	<u>te:</u> Segment <u>1</u> of <u>1</u>	<del>-</del>
1. Segment Description (Prod	cess/Fuel Type) (limit to 500 ch	naracters):
Burning of sawdust and wood	chips in boiler.	
	(0.00) a 0.0011 to	
2. Source Classification Code 1-02-009-06	e (SCC):  3. SCC Unit  Tons b	
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:	8. Maximum % Ash: 1.2	9. Million Btu per SCC Unit: 18.61
10. Segment Comment (limit		<u> </u>
N/A		
Segment Description and Ra	ite: Segment of	N/A
1. Segment Description (Prod	cess/Fuel Type) (limit to 500 c	haracters):
2. Source Classification Code	e (SCC): 3. SCC Uni	ts:
2. Source Glassification Cour	5. 500 om	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7 Mariana 0/ Calforn		1 actor.
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit		

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<b>Emissions Unit Information Section</b>	1	of	6	•	-	** *		,	٠.
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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	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
			,
<del></del>			

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Emissions Unit Information Section	<u> - 1</u>	of _	_6
Pollutant Detail Information Page	1	of_	1

# G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

## Emissions-Limited and Preconstruction Review Pollutants Only)

## Potential/Fugitive Emissions

r otential/Fugitive Emissions		
1. Pollutant Emitted:	2. Total Percent Effici	iency of Control:
СО	N/	/A
3. Potential Emissions:		4. Synthetically
7.47 lb/hour	32.70 tons/year	Limited? [ ]
5. Range of Estimated Fugitive Emissions: N/		,
	to to	ons/year
6. Emission Factor: 100%		7. Emissions Method Code:
Reference:		2
8. Calculation of Emissions (limit to 600 chara	icters):	
126 11 - 14 - 14 - 14 800 24 4 - 12 1 - 12		
$\frac{13.6 \ lbs \ / \ ton \ x \ 4,809.24 \ \ tons \ / \ yr}{2000 \ lbs \ / \ ton}$	= 32.70 tons / yr = 7.47	7 lbs / hr
2000 lbs / ton	·	
		•
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 chara	cters):
-		
N/	'A	
Allowable Emissions Allowable Emissions	of	
1. Basis for Allowable Emissions Code:	2. Future Effective D	ate of Allowable
	Emissions:	
3. Requested Allowable Emissions and Units:	4. Equivalent Allowa	able Emissions:
	lb/hour	tons/year
5. Method of Compliance (limit to 60 characte	rs):	
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit	to 200 characters):
,		,

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En	nissions Unit Information Section <u>1</u> H. VISIBLE EMISS (Only Regulated Emissions U	ION	S INFORMATION
Vis	sible Emissions Limitation: Visible Emissi	ons I	Limitation 1 of 1
	Visible Emissions Subtype: VE20	2.	Basis for Allowable Opacity: [X] Rule [ ] Other
3.	Requested Allowable Opacity: Normal Conditions: 20 % Ex Maximum Period of Excess Opacity Allowe	-	ional Conditions: 40% 2 min/hour
	Method of Compliance: Boiler operaters we.  Any malfunction immediately reported.	ould	monitor equipment functions and stack
5.	Visible Emissions Comment (limit to 200 c	harac	cters):
	N.	/A	
Co	I. CONTINUOUS  (Only Regulated Emissions Units  ontinuous Monitoring System: Continuous	Sub	-
			<u> </u>
Ι.	Parameter Code:	2.	Pollutant(s):
3.	CMS Requirement:	[	] Rule [ ] Other
4.	Monitor Information:		

3. CMS Requirement:

[ ] Rule [ ] Other

4. Monitor Information:
 Manufacturer:
 Model Number:

5. Installation Date:

6. Performance Specification Test Date:

7. Continuous Monitor Comment (limit to 200 characters):

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<b>Emissions</b>	Unit	Information	Section	1	 of	6 ·

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

## **Supplemental Requirements**

1.	Process Flow Diagram	
	[X] Attached, Document ID: 1E [] 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:1F	
	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	
	17/11	

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<b>Emissions</b>	Unit	<b>Information So</b>	ection	1	of	6

## 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 IE**

**Wood Fired Boiler Process Flow Diagram** 

## **EXHIBIT 1F**

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

والمهاورة والمراجي



#### 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

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## VISIBLE EMISSION OBSERVATION FORM 1

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# 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

Jacksonville, Florida

:December 6, 2000

Certificate Number

Location

Date of Issue

President

Director of Training

Emissions Unit Information Section 2	of	6	
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#### 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**

Difficulty Cliff Description and Status						
1. Type of Emissions Unit Addressed in Thi	s Section: (Check one)					
[ ]This Emissions Unit Information Section process or production unit, or activity, which has at least one definable emission	which produces one or more a					
[X] 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.						
	[ ] 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 Univ	t? (Check one)					
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.						
[ ] 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: [ ] No ID						
ID: 002 [ ] ID Unknown						
5. Emissions Unit Status Code:  A Date: No. 3 8/24/84 No. 4 7/24/00	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?				
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.						

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Emissions Unit Information Section 2 of 6						
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:						

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

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<b>Emissions Unit Information Section</b>	ı <u>2</u>	of	_6			
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# 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	V/A					
5. Requested Maximum Operation	ng Schedu	le:				
	24 hou	ırs/day	7 days/week			
	52 wee	eks/year	8,760 hours/year			
6. Operating Capacity/Schedule	Comment	(limit to 200 c	characters):			
approximately 4 days or 91 cycles dried in the kilns in 1999 and 200		All average of	i 6,926,010 bullyt of fulfiber was			
·						

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Emissions Unit Information Section 2 o	)Î	6
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# 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.

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Campaiona Chia intormation accuon 2 of 0	Emissions	Unit Inform	nation Section	2	of 6	
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## 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	
(2 212 420 F.A.C. Parrit Impares Paraval	
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.	
62-213.440, F.A.C.: Permit Content	
02-213.440, 1.A.C 1 chini Content	
62-213.460, F.A.C.: Permit Shield.	
02 2131100, 1 M.C 1 011111 011101	
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.	

<b>Emissions Unit Information Section</b>	2	of 6	
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# D. EMISSION POINT (STACK/VENT) INFORMATION (Regulated Emissions Units Only)

## **Emission Point Description and Type**

1. Identification of Point on Pl Flow Diagram? 002	Plot Plan or 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.						
	<del></del>					
4. ID Numbers or Descriptions	s of Emission U	nits with this Emi	ssion Point in Comn	non:		
002						
5. Discharge Type Code:	6. Stack Heig		7. Exit Diameter:	2		
R	N/A	feet	N/A	feet		
8. Exit Temperature:	9. Actual Vol	umetric Flow	10. Water Vapor:			
170 °F	Rate:	21/4	<b>3</b> 7/4	0/		
11 Maximum Dry Standard Flo	w Rate:					
. N/A	dscfm	Kiln No. 3	= 23	feet		
13. Emission Point UTM Coord	linates:	-				
Zone: 17 E	ast (km): 438.3	Nort	h (km): 3283.9			
14. Emission Point Comment (1	imit to 200 char	acters):				
Kiln Nos. 3 and 4 emission points are wall vents front and rear.						
				,		
170 °F  11. Maximum Dry Standard Flo N/A  13. Emission Point UTM Coord Zone: 17 E  14. Emission Point Comment (1	Rate: ow Rate: dscfm linates: ast (km): 438.3 imit to 200 char	N/A acfm 12. Nonstack Er Kiln No. 3 = Kiln No. 4 = Northacters):	N/A mission Point Height = 23 = 29			

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Emissions Unit Information Section 2	e of	6
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# E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segment Description and Rate: Segment N/A of

1. Segment Description (Prod	cess/Fuel Type)	(limit to 500 ch	arac	ters):			
N/A – Steam is generated by v	wood fired boiler	(001).					
2. Source Classification Cod	e (SCC):	3. SCC Units					
N/A		N/A					
4. Maximum Hourly Rate: N/A	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor: N/A			
7. Maximum % Sulfur: N/A	8. Maximum 9		9.	Million Btu per SCC Unit: N/A			
10. Segment Comment (limit	to 200 characters	):					
N/A							
14/11							
			•				
Segment Description and Ra	ite: Segment	of	N/A				
1. Segment Description (Process/Fuel Type) (limit to 500 characters):							
		T					
2. Source Classification Cod	e (SCC):	3. SCC Unit	s:				
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor:			
7. Maximum % Sulfur:	8. Maximum 9	% Ash:	9.	Million Btu per SCC Unit:			
10. Segment Comment (limit	10. Segment Comment (limit to 200 characters):						

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<b>Emissions</b>	Unit 1	Inform	ation	Section	2	of (	6
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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1.	Pollutant Emitted	Primary Control     Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
	VOC	N/A	N/A	NS
				_
_	-			
			·	
			-	
			-	
			-	,
			<u> </u>	
		_	:	

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<b>Emissions Unit Information Section</b>	2	_ of <u>6</u>		
Pollutant Detail Information Page	<u>1</u>	of <u>1</u>		

# G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

## Potential/Fugitive Emissions

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:				
VOC	N/A				
3. Potential Emissions: 0.44 lb/hour	1.92 tons/year	4. Synthetically Limited? [ ]			
5. Range of Estimated Fugitive Emissions: N/.  [ ] 1 [ ] 2 [ ] 3		ns/year			
6. Emission Factor: 0.211 lb/1000 bdf		7. Emissions			
Reference:		Method Code:			
8. Calculation of Emissions (limit to 600 chara	cters):				
$\frac{(0.211  lbVOC / 1000  bdf)(200,0)}{(24  hr  day^{-1})}$	$\frac{000bdf/4days)}{} = 0.44lb$	$ohr^{-1}$			
$\frac{(0.211  lbVOC / 1000  bdf)(18,200)}{(2000  lbs  ton^{-1})}$	$0.000 bdf / yr^{-1}$ = 1.92 to	ns yr <sup>-1</sup>			
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 charac	ters):			
N/A					
Allowable Emissions Allowable Emissions	of N/A				
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	ate of Allowable			
3. Requested Allowable Emissions and Units:	4. Equivalent Allowal	ole Emissions:			
	lb/hour	tons/ýear			
5. Method of Compliance (limit to 60 characters):					
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to	o 200 characters):			

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<b>Emissions Unit Information Section</b>	2	of 6	
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# H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>N/A</u> of

1.	Visible Emissions Subtype:	Basis for Allowable Opacity:     [ ] Rule
3.	Requested Allowable Opacity: Normal Conditions: % Ex Maximum Period of Excess Opacity Allower	ceptional Conditions: % ed: min/hour
4.	Method of Compliance:	
5.	Visible Emissions Comment (limit to 200 c	naracters):
Co	(Only Regulated Emissions Units	MONITOR INFORMATION Subject to Continuous Monitoring)
<u>Ct</u>	ntinuous Monitoring System: Continuous	Monitor <u>N/A</u> of
1.	Parameter Code:	Monitor N/A of  2. Pollutant(s):
1.	Parameter Code:	2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:
1. 3. 4.	Parameter Code:  CMS Requirement:  Monitor Information:  Manufacturer:  Model Number:	2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date:

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

## **Supplemental Requirements**

1.	Process Flow Diagram				
	[X] Attached, Document ID: 1G	[] N	lot Applicable	[]	Waiver Requested
2.	Fuel Analysis or Specification	F3.7 1	NT - 4 12 13	F	1 XX ' 15 1
	[ ] Attached, Document ID:	_ [X ]	Not Applicable	L	] 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				
	[ ] Attached, Document ID:	_			
	[ ] Previously submitted, Date:				
	[X ] 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 Construct	tion Pe	ermit Application		
	[ ] Attached, Document ID:	_ [X ]	Not Applicable		
9.	Other Information Required by Rule or	Statute			
	[ ] Attached, Document ID:				
10.	Supplemental Requirements Comment:				•
		N/A			t
		1 1/1 1			

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## 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

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## **EXHIBIT 1G**

**Dry Kiln Process Flow Diagram** 

<b>Emissions Unit Information Section</b>	3	of 6	
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## 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)							
[X] 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).							
	process or production units and activities which has at least one definable emission point						
[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or many process or production units and activities which produce fugitive emissions only.	ore						
2. Regulated or Unregulated Emissions Unit? (Check one)							
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.							
[ ] 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: [ ] No ID ID: 003 [ ] ID Unknown							
5. Emissions Unit Status Code: A Bag Filters 7/89 Cyclone 4/97  6. Initial Startup Bag Filters 7/89 Cyclone 4/97  7. Emissions Unit Major Group SIC Code:  [ ]  2511	t?						
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.							

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	<b>Emissions</b>	<b>Unit Information Section</b>	3	of 6	
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## **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

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## **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</b>	Unit !	Information	Section	3	of 6	5
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# 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 Throughp	ut Rate:	5,236 lb/h	
4.	Maximum Production Rate: N/	A		
5.	Requested Maximum Operating	Schedule	<b>:</b>	
		24 hour	s/day	7 days/week
		52 <u>weel</u>	ks/year	8,760 hours/year
6.	Operating Capacity/Schedule Co	omment (	limit to 20	0 characters):
Sy				ation with Chas Campbell of Clean Air bughput based on year 2000 data is

# 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.

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## **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.	

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

## **Emission Point Description and Type**

1. Identification of Point on Pl Flow Diagram? 003	2. Emission Point Type Code:						
<ol> <li>Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):</li> <li>Clean air discharge point on Bag Filter Unit A.</li> <li>Clean air discharge point on Bag Filter Unit B.</li> <li>Cyclone has no emission point as its air discharge is returned to the bag filters.</li> </ol>							
4. ID Numbers or Descriptions	s of Emission U	nits with this Emi	ssion Point in Commo	n:			
N/A							
5. Discharge Type Code:	6. Stack Heig	ht:	7. Exit Diameter:				
Н	N/A	feet	N/A	feet			
8. Exit Temperature:	9. Actual Vol	umetric Flow	10. Water Vapor:				
77 °F	Rate:	NI/A action	NT/A	07			
11. Maximum Dry Standard Flo	L ow Rate:	N/A acfm	N/A mission Point Height:	<u>%</u>			
N/A	dscfm	Filters A &	<del>-</del>				
13. Emission Point UTM Coord	linates:			•			
Zone: 17 E	ast (km): 438.3	Nort	h (km): 3278.9				
14. Emission Point Comment (1	imit to 200 char	acters):					
N/A				,			

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

Segment Description and R	ate: Segment N/	A_ of_		
Segment Description (Pro			aract	ers):
N/A				
IN/A				
	1 (0.00)	2 900 H-:-		
2. Source Classification Coo	ie (SCC):	3. SCC Units N/A	:	
4. Maximum Hourly Rate: N/A	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur:	8. Maximum 9	% Ash:	9.	Million Btu per SCC Unit:
N/A	N/A	Λ		N/A
10. Segment Comment (limit	to 200 characters	):		
N/A				
IV/A				
Segment Description and D	ata. Saamant	of.		
Segment Description and R				
Segment Description (Pro	ocess/Fuel Type)	(limit to 500 ch	iarac	ters):
	-			
2. Source Classification Coo	le (SCC):	3. SCC Unit	s:	
4. Maximum Hourly Rate:	5. Maximum	Annual Rate:	6.	Estimated Annual Activity
7 Maniana 0/ C 16	0 ) (	/ A =1		Factor:
7. Maximum % Sulfur:	8. Maximum 9	% Asn:	9.	Million Btu per SCC Unit:

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10. Segment Comment (limit to 200 characters):

# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	Primary Control     Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM10	101	0	NS
11/1/11/11	101		110
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,			
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		_	_
	_	_	
			,
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Pollutant Detail Information Page	1	of	1	

# G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

## Potential/Fugitive Emissions

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:					
PM/PM10	99.96					
3. Potential Emissions:	4. Synthetically					
2.09 lb/hour	9.17 tons/year Limited? [X]					
5. Range of Estimated Fugitive Emissions: N	'A					
[ ] 1 [ ] 2 [ ] 3	totons/year					
6. Emission Factor: 0.04 %	7. Emissions					
Reference: Manufacturer's data.	Method Code: 2					
8. Calculation of Emissions (limit to 600 chara	acters):					
5,236 lb/hr x 0.0  2.09 lb / hr x 8,760 hr  2000 lbs / ton	04% = 2.09  lb/hr $\frac{s / yr}{} = 9.17 tons / yr$					
9. Pollutant Potential/Fugitive Emissions Con	ment (limit to 200 characters):					
N/A						
Allowable Emissions Allowable Emissions	of N/A					
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 characte	ers):					
6. Allowable Emissions Comment (Desc. of C	perating Method) (limit to 200 characters):					

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E11112210112	UIII	111101 mation	Section	3	UI	v	

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

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>N/A</u> of

1. Vis	**				
	VE 20	[X] Rule [ ] Other			
3. Rec	quested Allowable Opacity:				
No	rmal Conditions: 20% Ex	ceptional Conditions: N/A %			
Ma	ximum Period of Excess Opacity Allowe	ed: N/A min/hour			
I.	Method of Compliance:				
Tes	ting of VE at minimum of 90% of opera	ting rate.			
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5. Vis	ible Emissions Comment (limit to 200 c	naracters):			
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	14	/A			
	I CONTINUOUS	MONITOR INFORMATION			
I. CONTINUOUS MONITOR INFORMATION					
	Only Regulated Emissions Units	Subject to Continuous Manitoring)			
		Subject to Continuous Monitoring)			
Contin	(Only Regulated Emissions Units uous Monitoring System: Continuous				
1. Par	uous Monitoring System: Continuous ameter Code:	Monitor N/A of  2. Pollutant(s):			
1. Par	uous Monitoring System: Continuous	Monitor N/A of			
1. Par 3. CM	uous Monitoring System: Continuous ameter Code:  (S Requirement:	Monitor N/A of  2. Pollutant(s):			
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DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 3 of 6

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

## **Supplemental Requirements**

1.	Process Flow Diagram		
	[X] Attached, Document ID: 1D [] Not Applicable	[]	Waiver Requested
2.	Fuel Analysis or Specification	г	1 W-' D 4 1
	[ ] Attached, Document ID: [X ] Not Applicable	L	] 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: 1H		
	[ ] 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	1	
	[ ] 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		,
	IN/A		
			•

DEP Form No. 62-210.900(1) - Form

<b>Emissions Unit Information Section</b> 3	01	0	
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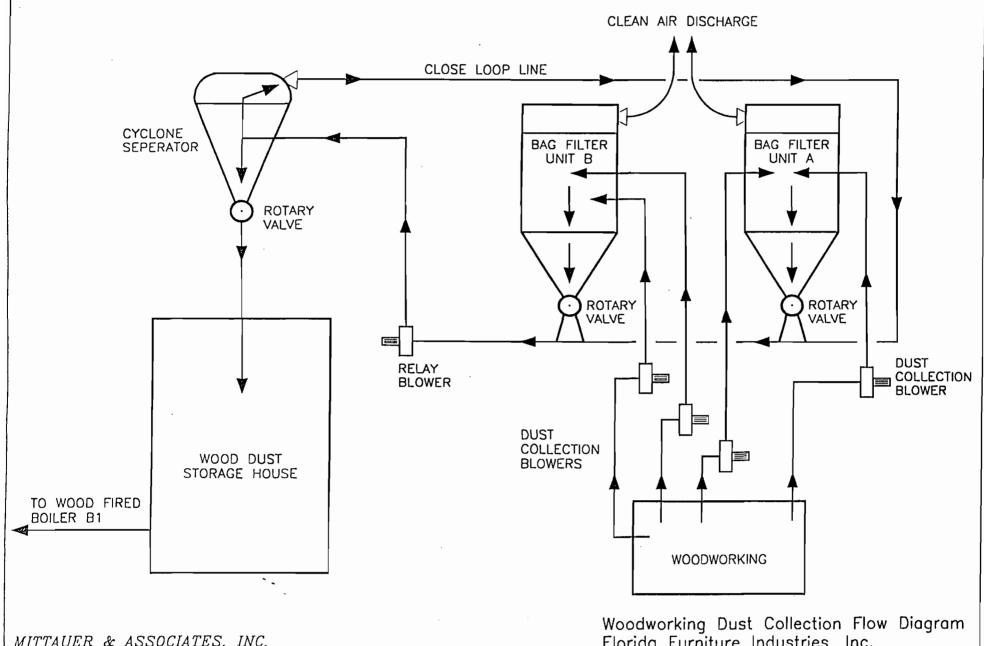
## Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID: [X ] Not Applicable
12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID: [X] Not Applicable
[ ] Attached, Document ID [A ] 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)
13. Acid Kaili Fait Application (Haid-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

24

## **EXHIBIT 1D**

**Woodworking Dust Collection Flow Diagram** 



MITTAUER & ASSOCIATES, INC.

CONSULTING ENGINEERS

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

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 OBSE	RVATION FORM
Method Used (Circle One)	Other
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Facility Name	urniture
Plant	
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# EPA VISIBLE EMISSION OBSERVATION FORM

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# 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

Jacksonville, Florida

**Десетвет** 6, 2000

Cartificate Number

Location

Date of Issue

President

Director of Training

<b>Emissions Unit Information Section</b>	4	of	6	
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## 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)									
[X] 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).									
[ ]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.									
[ ] 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)									
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.									
[ ] 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: [ ] No ID ID: 001 (Renumber to 004) [ ] ID Unknown									
5. Emissions Unit Startup Status Code: A 12/85 7. Emissions Unit Major Group SIC Code: 2511 8. Acid Rain Unit?									
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.									

DEP Form No. 62-210.900(1) - Form

<b>Emissions</b>	Unit	<b>Information Section</b>	4	of	6	

## **Emissions Unit Control Equipment**

1.	Contr	ol E	qui	pme	ent/Met	hod	Desc	riptic	n (I	Limi	t to	200	chara	acters	per	devi	ce o	r me	thod)	):
** 7	1.1			٠,	C 11								14		1	TI.	A . 1			

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

Emissions Unit Information Section 4 of 6	I
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# B. EMISSIONS UNIT CAPACITY INFORMATION (Regulated Emissions Units Only)

## **Emissions Unit Operating Capacity and Schedule**

1.	Maximum Heat Input Rate:	8.74		mr	nBtu/hr
2.	Maximum Incineration Rate:	N/A	lb/hr	tor	ns/day
3.	Maximum Process or Throughpu	ıt Rate:	1,068 lb/hr	12.82 tons/day	
4.	Maximum Production Rate: N/A	A			
5.	Requested Maximum Operating	Schedu	le:		
		24 hou	ırs/day		7 days/week
		52 wee	eks/year		8,760 hours/year
6.	Operating Capacity/Schedule Co	mment	(limit to 200	characters):	
Ca	pacity based on original permitted	I 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.

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DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section	4	of 6	5
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## 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.	

Emissions Unit Information Section 4 of 6

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

## **Emission Point Description and Type**

	Identification of Point on Pl	ot Plan or	2.	Emission Po	int Type Code:	
	Flow Diagram? 004				1	
	Descriptions of Emission Po 100 characters per point): Boiler stack.	oints Comprising	g this	s Emissions U	Jnit for VE Tracking (l	imit to
4.	ID Numbers or Descriptions	s of Emission Ur	nits v	with this Emi	ssion Point in Commor	1:
N/A	A					
5.	Discharge Type Code:	6. Stack Heig	ht:		7. Exit Diameter:	_
	V	35		feet	1.8	feet
8.	Exit Temperature:	9. Actual Vol	ume	tric Flow	10. Water Vapor:	
	450 °F	Rate:	700	<del>C</del>	NT/A	07
11.	Maximum Dry Standard Flo		.700 12.		N/A nission Point Height:	%
	N/A	dscfm		N/A		feet
13.	Emission Point UTM Coord	linates:		_		
	Zone: 17 E	ast (km): 436.3		Nortl	n (km): 3283.6	
14.	Emission Point Comment (l	imit to 200 char	acter	rs):		
N/A	Δ					

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Emissions Unit Information Section	4	of 6	
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# E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segment Description and Rate: Segment N/	<u>.                                    </u>	`
--	--	---

Segment Description and Nate. Segment 1971 of				
1. Segment Description (Prod	1. Segment Description (Process/Fuel Type) (limit to 500 characters):			
Burning of sawdust and wood	chips in boiler.			
2. Source Classification Cod	e (SCC):	3. SCC Units	:	
1-02-009-06	·	tons bu	rned	
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity
0.54	N/A			Factor: N/A
7. Maximum % Sulfur:	8. Maximum 9	% Ash:	9.	Million Btu per SCC Unit:
0	0.6			16.37 mmbtu/ton
10. Segment Comment (limit	to 200 characters)	):		
N/A				
Segment Description and Rate: Segment N/A of				
1. Segment Description (Pro-	cess/Fuel Type)	(limit to 500 cl	narac	eters):
2. Source Classification Cod	e (SCC):	3. SCC Unit	s:	<del>-</del>
	, ,		,	
4. Maximum Hourly Rate:			Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum % Ash:		9.	Million Btu per SCC Unit:
10. Segment Comment (limit	to 200 characters	):		

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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	2. Primary Control	3. Secondary Control	4. Pollutant
	Device Code	Device Code	Regulatory Code
CO	076	N/A	NS
PM	076	N/A	NS
VOC	076	N/A	NS
·			
	-		
			,
<u></u>			

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Emissions Unit Information Section	44	_ of	<u>6</u>	
Pollutant Detail Information Page		of	-	

## G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A	
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
3. Potential Emissions:	4. Synthetically tons/year Limited? [ ]
5. Range of Estimated Fugitive Emissions: No.	/A to tons/year
6. Emission Factor:	7. Emissions
Reference: Manufacturer's data.	Method Code:
8. Calculation of Emissions (limit to 600 chara	acters):
9. Pollutant Potential/Fugitive Emissions Com	ament (limit to 200 characters):
7. Tollutant Totellia/Tugitive Linissions Con	iment (mint 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 characte	ers):
6. Allowable Emissions Comment (Desc. of C	Operating Method) (limit to 200 characters):

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 4 of 6	Information Section 4 of 6
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# H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation \_ 1 of \_ 1

Visible Emissions Limitation.									
1.	. Visible Emissions Subtype: 2. Basis for Allowable Opacity:								
	VE 20	[X] Rule [ ] Other							
3.	Requested Allowable Opacity:	, ,							
		ceptional Conditions: 40%							
	Maximum Period of Excess Opacity Allowe	•							
	Stack VE. Annual VE test. Any malfunction								
	I. Method of Compliance:								
	Boiler operators monitor equipment functions and stack VE. Annual VE test. Any								
	malfunction immediately reported.	•							
5.									
	N	'A							
		ACONTOR INFORMACION							
I. CONTINUOUS MONITOR INFORMATION									
		Subject to Continuous Monitoring)							
<u>C</u>		Subject to Continuous Monitoring)							
	(Only Regulated Emissions Units	Subject to Continuous Monitoring)							
1.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:	Subject to Continuous Monitoring)  Monitor N/A of  2. Pollutant(s):							
	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous	Subject to Continuous Monitoring)  Monitor N/A of	,						
1.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:	Subject to Continuous Monitoring)  Monitor N/A of  2. Pollutant(s):							
3.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:	Subject to Continuous Monitoring)  Monitor N/A of  2. Pollutant(s):							
3.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information:	Subject to Continuous Monitoring)  Monitor N/A of  2. Pollutant(s):	-						
3.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	Subject to Continuous Monitoring)  Monitor N/A of							
<ol> <li>3.</li> <li>4.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information:  Manufacturer:  Model Number:	Subject to Continuous Monitoring)  Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other							
<ol> <li>3.</li> <li>4.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Subject to Continuous Monitoring)  Monitor _N/A of  2. Pollutant(s):  [ ] Rule							
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information:  Manufacturer:  Model Number:	Subject to Continuous Monitoring)  Monitor _N/A of  2. Pollutant(s):  [ ] Rule							
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Subject to Continuous Monitoring)  Monitor _N/A of  2. Pollutant(s):  [ ] Rule							
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Subject to Continuous Monitoring)  Monitor _N/A of  2. Pollutant(s):  [ ] Rule							
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Subject to Continuous Monitoring)  Monitor _N/A of  2. Pollutant(s):  [ ] Rule							
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Subject to Continuous Monitoring)  Monitor _N/A of  2. Pollutant(s):  [ ] Rule							

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Emissions Unit Information Section 4 of 6

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

## **Supplemental Requirements**

1.	Process Flow Diagram								
	[X] Attached, Document ID: 3E	[] N	ot Applicable	[]	Waiver Requested				
2.	Fuel Analysis or Specification				-				
	[ ] Attached, Document ID:	[X]	Not Applicable	[	] Waiver Requested				
3.	Detailed Description of Control Equipm	ent							
	[ ] 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: 3F	•							
	[ ] Previously submitted, Date:								
	[ ] Not Applicable								
	[ ] 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 Construct	ion Pe	rmit Application						
	[ ] Attached, Document ID:								
9.	Other Information Required by Rule or S								
	[ ] Attached, Document ID:	. [^ ]	Not Applicable						
10	10. Supplemental Requirements Comment:								
		31/4			,				
		N/A							
1									

	Emissions	Unit	Informa	tion S	Section	4	of	6	
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## 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** 

## 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

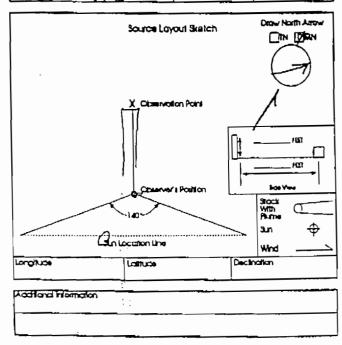
ASTECH ENVIRONMENTAL SERVICES 13170-58 ATLANTIC BLVD. SUITE 131 JACKSONVILLE, FLORIDA 32225 (904) 221-7174

DONNIE L. LEEPER

TEL:9043295455

## **EPA** VISIBLE EMISSION OBSERVATION FORM 1

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# 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

Jacksonville, Florida

Десетбет 6, 2000

Conflicate Number

Lecation

Date of issue

President

Observer of Trainless

Emissions	<b>Unit Information</b>	on Section -	5	of	6	
			<b>J</b>	V.	•	-

#### 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**

Emissions on Description and Status					
1. Type of Emissions Unit Addressed in This Section: (Check one)					
[X] 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).					
[ ]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.					
[ ] 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)					
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.					
[ ] 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: [ ] No ID ID: 002 (renumber to 005) [ ] ID Unknown					
5. Emissions Unit Status Code: A   6. Initial Startup Date:					
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.					

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<b>Emissions Unit Information Section</b>	5		of	6	
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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	<del>,</del>
3.	Incinerator Information: N/A		
	Dwell Temperature:		°F
	Dwell Time:		seconds
	Incinerator Afterburner Temperature:		°F

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<b>Emissions</b>	Unit	<b>Information</b>	Section	5	of. 6	
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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

<b>Emissions</b>	Unit	Information	Section	5	of	6	

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

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<b>Emissions</b>	Unit	Information Section	5	of	. 6 .	

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			7
3.	Incinerator Information: N/A				
	Dwell Temperature:			°F	
	Dwell Time:			seconds	
	Incinerator Afterburner Temperature:			°F	

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<b>Emissions Unit Information Section</b> 5	of	6
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## 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 Through	hput Rate: 6,958 lb/hr (t	otal all 4 units)			
4. Maximum Production Rate: 1	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 c	haracters):			
Total capacity of 6,958 lb/hr as per Systems, Statesville, NC, (704) 8	•	th Chas Campbell of Clean Air			

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Emissions	Unit	Information	Section	5	of	6	

## 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.

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 5	of	6	
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## **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 Pl	ot Plan or	2. Emission Po	oint Type Code:			
Flow Diagram? 005			3			
2 D : :: CD : : D		41 to E . to . to . to	T'AC AME TO 1:	(1: :, :		
3. Descriptions of Emission Po	oints Comprising	g this Emissions (	Unit for NE Tracking	(limit to		
100 characters per point):  1. Clean air discharge poin	at on Rog Filter	Nat Plant No. 3				
<ol> <li>Clean air discharge point on Bag Filter A at Plant No. 3.</li> <li>Clean air discharge point on Bag Filter B at Plant No. 3.</li> </ol>						
3. Clean air return to plant on Bag Filter C at Plant No. 3.						
4. Closed loop return line						
4. ID Numbers or Descriptions	s of Emission U	nits with this Emi	ssion Point in Comm	on:		
•		•				
N/A						
	1		I =			
5. Discharge Type Code:	6. Stack Heig		7. Exit Diameter:	200		
Filters A & B = $V$	Filters A, B, &		Filters A, B, & C =	3.8 feet		
Filters C & D = P	Filter D = 24 fe 9. Actual Vol		Filter D = 3.3 feet 10. Water Vapor:			
8. Exit Temperature: All Filters = 77°F		A = 50,287	10. water vapor.			
All Fillers = //*r	Filter B = 54,7	•	N/A	%		
	Filter $C = 54,2$		IVA	70		
	Filter D = $24,5$					
11. Maximum Dry Standard Flo	ow Rate:		mission Point Height	:		
N/A	dscfm	N/A		feet		
13. Emission Point UTM Coord	1:					
Zone: 17 E	ast (km): 436.4	Nort	h (km): 3283.4			
14. Emission Point Comment (	imit to 200 char	acters):	·			
`		,				
N/A						
				,		

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Emissions Unit Information Section 5	)f	6
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## 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 Cod	e (SCC):	3. SCC Units	S:			
	` ′	tons bu	rned			
4. Maximum Hourly Rate:	5. Maximum A	5. Maximum Annual Rate:		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 Ra	ate: Segment N/	<u>A</u> of		-		
1. Segment Description (Pro	cess/Fuel Type)	(limit to 500 cl	harac	ters):		
2. Source Classification Cod	e (SCC):	3. SCC Uni	ts:			
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor:		
7. Maximum % Sulfur:	8. Maximum %	6 Ash:	9.	Million Btu per SCC Unit:		
10. Segment Comment (limit	to 200 characters)	:	1			
	***					

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Emissions	Unit In	formation	Section	5	of 6	
T 11119910119	OHIL III	ivi mativii	Section	3	VI U	

## F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	Primary Control     Device Code	4. Pollutant Regulatory Code	
PM/PM 10	101	Device Code 0	NS
	_		
		_	
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			,

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section		of <u>6</u>
Pollutant Detail Information Page	1	of <u>1</u>

## G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

## Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A						
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:					
PM/PM10	99.9	96				
3. Potential Emissions:		4. Synthetically				
2.78 lb/hour	12.19 tons/year	Limited? [ ]				
5. Range of Estimated Fugitive Emissions: N/A						
[ ] 1 [ ] 2 [ ] 3	to to	ns/year				
6. Emission Factor:		7. Emissions				
Reference: Manufacturer's data.		Method Code: 2				
8. Calculation of Emissions (limit to 600 chara	cters):					
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 tor	n/yr					
9. Pollutant Potential/Fugitive Emissions Comm	ment (limit to 200 charac	ters):				
N/A						
Allowable Emissions of N/A						
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable				
3. Requested Allowable Emissions and Units:	4. Equivalent Allowab	ole Emissions:				
lb/hour tons/year						
5. Method of Compliance (limit to 60 character	rs):					
6. Allowable Emissions Comment (Desc. of O)	perating Method) (limit to	200 characters):				

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<b>Emissions</b>	Unit	Information	Section	. 5	of	6.	
	C 1115	THIO I MINDLAND	COULDIN		~-		

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

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>1</u> of <u>1</u>

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity:				
VE 20	[X] Rule [ ] Other				
3. Requested Allowable Opacity:					
Normal Conditions: 20%	Exceptional Conditions: N/A%				
Maximum Period of Excess Opacity A	·				
,					
4. Method of Compliance:					
Testing of VE at minimum of 90% of	operating rate.				
l coming of the minimum of your of					
5. Visible Emissions Comment (limit to	200 characters):				
	N/A				
I. CONTINU	OUS MONITOR INFORMATION				
(Only Regulated Emissions Units Subject to Continuous Monitoring)					
Continuous Monitoring System: Continuous Monitor N/A of					
1. Parameter Code:	2. Pollutant(s):				
2 CMC D	[ ] Dula [ ] Odani				
3. CMS Requirement:	[ ] Rule [ ] Other				
4. Monitor Information:					
Manufacturer:					
Model Number:	Serial Number:				
5. Installation Date:	6. Performance Specification Test Date:				
	or a stronger of position rost Bate.				
7. Continuous Monitor Comment (limit t	to 200 characters):				
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DEP Form No. 62-210.900(1) - Form

Emissions	Unit	Inform	ation	Section	5	of	6

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

## **Supplemental Requirements**

1.	Process Flow Diagram		W * D 1
	[X] Attached, Document ID: 3D [] Not Applicable	IJ	Waiver Requested
2.	Fuel Analysis or Specification		1 0000 00000000000000000000000000000000
	[ ] 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: 3G		
	[ ] 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:		
	27/4		
	N/A		

25

<b>Emissions</b>	Unit	Informat	ion Sec	etion 5	5 of	. 6

## 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

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## **EXHIBIT 3D**

**Woodworking Dust Collection Flow Diagram** 

## 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 Und (Clark Cre)

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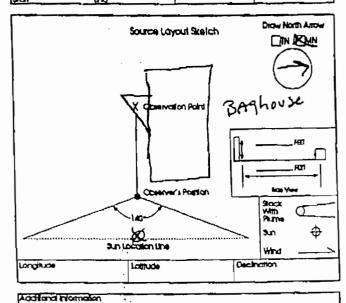
## VISIBLE EMISSION OBSERVATION FORM 1

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# 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

Jacksonville, Florida

December 6, 2000

Conflicate Number

Location

Date of Issue

President

Director of Training

Emissions	Unit	<b>Information Section</b>	6	of 6	
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#### 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**

Emissions Cirk Description and Status						
1. Type of Emissions Unit Addressed in This Section: (Check one)						
[ ]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).						
[X] 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.						
[ ] 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)					
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.						
[ ] 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: ID: 003 (to be renumbered to 006)		[ ] No ID [ ] ID Unknown				
5. Emissions Unit Status Code: Date:  A 12/85	7. Emissions Unit Major Group SIC Code: 2511	8. Acid Rain Unit?				
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.						

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<b>Emissions</b>	Unit	Information !	Section	<b>. 6</b>	of	6	

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

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Emissions Unit Information Section 6 of 6

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

## **Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat I	nput Rate:	N/A			mmBtu/hr		
2. Maximum Incine	ration Rate:	N/A	lb/hr		tons/day		
3. Maximum Process or Throughput Rate: 240 Furniture Units/hr							
4. Maximum Produ	4. Maximum Production Rate: N/A						
5. Requested Maxim	5. Requested Maximum Operating Schedule:						
		8 hours/	'day		5 days/week		
		52 week	s/year		1,926.5 hours/year		
6. Operating Capacity/Schedule Comment (limit to 200 characters):							
VOC Emissions from Finish Coating Operations  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 = $\frac{378.30 \text{ tons} + 364.79 \text{ tons}}{1925 \text{ hrs} + 1928 \text{ hrs}} = 0.1929 \text{ tons / yr}$ $(371.55 \text{ tons/yr})(0.1929 \text{ tons/hr}) = 1926 \text{ hrs/yr}$							

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

## 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.

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Emissions Unit Information Section 6 of	0.	
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## 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 Pl	ot Plan or	2. Emission Po	int Type Code:	
Flow Diagram? 006		3, 4		
2 D : : : : : : : : : : : : : : : : : :		41.5		<b>71</b> 2
3. Descriptions of Emission Po	oints Comprising	g this Emissions (	Unit for VE Trackin	g (limit to
100 characters per point):				
No VE				
TIO V E				
4. ID Numbers or Descriptions	s of Emission Ur	nits with this Emi	ssion Point in Com	mon:
•				
N/A				
5. Discharge Type Code:	6. Stack Heigh		7. Exit Diameter:	
F,V	Spray Booth =		Spray Booths 1-6	
	Ovens = 24 fee	:t	Spray Booth $7 = 2$	.5 feet
			Ovens = 1.3 feet	
8. Exit Temperature:	9. Actual Vol	umetric Flow	10. Water Vapor:	
Spray Booths = $77^{\circ}$ F	Rate:			
Ovens = $125$ °F	(See Field 14)	acfm	N/A	%
11. Maximum Dry Standard Flo	ow Rate:	12. Nonstack Er	nission Point Heigh	 nt:
N/A	dscfm	Fugitive Sou		
12 F	1.			
13. Emission Point UTM Coord	dinates:			
Zone: 17	ast (km): 436.4	Nort	h (km): 3283.4	
14. Emission Point Comment (	imit to 200 char	acters):		
Spray Booth No. $1 - 26,000$ cfr	n			
Spray Booth No. $2 - 26,000$ cfr	n			
Spray Booth No. $3 - 26,000$ cfr	n			
Spray Booth No. $4 - 26,000$ cfr	n			*
Spray Booth No. $5 - 26,000$ cfr	n			
Spray Booth No. $6 - 26,000$ cfr	n			
Spray Booth No. $7 - 13,500$ cfr	n			
Oven No. $1 - 1,000 \text{ cfm}$				
Oven No. $2 - 1,000 \text{ cfm}$				
Oven No. 3 – 750 cfm				
Oven No. 4 – 750 cfm				
Oven No. 5 – 750 cfm				

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<b>Emissions</b>	Unit	<b>Information</b>	Section	. 6	of	6	

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

Segment Description and Ra	ite: Segment	of					
1. Segment Description (Pro-	1. Segment Description (Process/Fuel Type) (limit to 500 characters):						
N/A – Steam heat is generated	l by Wood Fired F	Boiler (004).					
	(0.00) N/A	2 600 11-4-					
2. Source Classification Cod	e (SCC): N/A	3. SCC Units tons bu					
4. Maximum Hourly Rate: N/A	5. Maximum A N/A	Annual Rate:	6. Estimated Annual Activity Factor: N/A				
7. Maximum % Sulfur: N/A	8. Maximum % N/A		9. Million Btu per SCC Unit: N/A mmbtu/ton				
10. Segment Comment (limit	to 200 characters)	:					
N/A							
Segment Description and Ra	ate: Segment N/	<u>A</u> of					
Segment Description (Pro	cess/Fuel Type)	(limit to 500 cl	naracters):				
2. Source Classification Cod	e (SCC):	3. SCC Unit	s:				
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6. Estimated Annual Activity Factor:				
7. Maximum % Sulfur:	8. Maximum %	6 Ash:	9. Million Btu per SCC Unit:				
10. Segment Comment (limit	to 200 characters)	) <b>:</b>					

T3	w t • .	T C	C		- C		
Emissions	s Unit	Information	Section	0	01	O	

# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	Primary Control     Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	N/A	N/A	EL 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
	-		
			,

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<b>Emissions Unit Information Section</b>	6	of_	6_	
Pollutant Detail Information Page	1	of	7	

### G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A					
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:				
VOC	0				
3. Potential Emissions:	4. Synthetically				
385.7 lb/hour	371.55 tons/year Limited? [X]				
5. Range of Estimated Fugitive Emissions: N/ [ ] 1 [ ] 2 [ ] 3	A to tons/year				
6. Emission Factor: 100% Emitted	7. Emissions				
Reference:	Method Code: 2				
8. Calculation of Emissions (limit to 600 chara	acters):				
1999: Plant Nos. 1 & 3 combined = 378.30 ton. 2000: Plant Nos. 1 & 3 combined = 364.79 ton. Average total VOC Emissions for 1999/2000 = Average hours of operation for 1999/2000 = 192 371.55 tons / 1926.5 hrs = 0.1929 tons/hr = 385	s = 729,570.3 lbs 743,089.6 lbs = 371.55 tons 26.5 hrs				
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 characters):				
VOC emission rates include pollutants which ar	re listed as both VOC and HAP.				
Allowable Emissions Allowable Emissions	1of				
1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: 8/1/01				
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions:				
371.55 tons/yr	385.7 lb/hour 371.55 tons/year				
5. Method of Compliance (limit to 60 characte Tracking of VOC emissions using REGMET 6.					
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):				
N/A					

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Emissions Unit Information Section _	6	_ of _	_6_	
Pollutant Detail Information Page	2	of	7	

Potential/Fugitive Emissions N/A		
1. Pollutant Emitted:	2. Total Percent Efficie	•
H085	N/A	Ą
3. Potential Emissions:		4. Synthetically
9.386 lb/hour	9.041 tons/year	Limited? [ ]
5. Range of Estimated Fugitive Emissions: N/.		ns/year
6. Emission Factor: 100% Emitted		7. Emissions
Reference:		Method Code: 2
8. Calculation of Emissions (limit to 600 chara	cters):	
1999: Plant Nos. 1 & 3 combined = 9,783.5 lbs 2000: Plant Nos. 1 & 3 combined = 9,610.5 lbs Average H085 emissions for 1999/2000 = 18,00 Average hours of operation for 1999/2000 = 192 18,082.6 lbs / 1926.5 hrs = 9.386 lbs/hr	+ 8,775.5 lbs = 18,386.0 82.6 lbs = 9.041 tons	
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 charac	ters):
Ethol Benzene included in VOC total.	_	
Allowable Emissions Allowable Emissions N	//A_of	
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	ate of Allowable
3. Requested Allowable Emissions and Units:	4. Equivalent Allowat	ole Emissions:
5. Method of Compliance (limit to 60 characte	rs):	
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to	o 200 characters):
	·	

<b>Emissions Unit Information Section</b>	6	of <u>6</u>	
Pollutant Detail Information Page	3	of 7	

### G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A	
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
H096	N/A
3. Potential Emissions:	4. Synthetically
5.544 lb/hour	5.341 tons/year Limited? [ ]
5. Range of Estimated Fugitive Emissions: N/	
	totons/year
6. Emission Factor: 100% Emitted	7. Emissions
Reference:	Method Code:
8. Calculation of Emissions (limit to 600 chara	cters):
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	
Average H096 emissions for 1999/2000 = 10,66	
Average hours of operation for 1999/2000 = 192	26.5 hrs
10,681.4  lbs / 1926.5  hrs = 5.544  lbs/hr	
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 characters):
Glycol ethers included in VOC total.	·
Allowable Emissions Allowable Emissions N	<u>//A</u> 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 characte	rs):
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):

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<b>Emissions Unit Information Section</b>	6 .	_ of _	<u>6</u>	
Pollutant Detail Information Page	4	_ of _	7	

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
H115	N/A			
3. Potential Emissions:	4. Synthetically			
0.9042 lb/hour	0.7000 tons/year Limited? [ ]			
5. Range of Estimated Fugitive Emissions: N/A				
[ ] 1 [ ] 2 [ ] 3 6. Emission Factor: 100% Emitted	to tons/year 7. Emissions			
	Method Code:			
Reference:	2			
8. Calculation of Emissions (limit to 600 chara	cters):			
2000: Plant Nos. 1 & 3 combined = 839.7 lbs + Average H115 emissions for 1999/2000 = 1,399 Average hours of operation for 1999/2000 = 192 1,742.0 lbs / 1926.5 hrs = 0.9042 lbs/hr	9.7  lbs = 0.7000  tons			
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 characters):			
-				
Methanol included in VOC total.				
Allowable Emissions Allowable Emissions N				
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 character	rs):			
·				
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):			

<b>Emissions Unit Information S</b>	Section	6	of	<u>6</u>
Pollutant Detail Information	Page	5	of	7

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
H120	N/A			
3. Potential Emissions:	4. Synthetically			
0.7266 lb/hour	0.6999 tons/year Limited? [ ]			
5. Range of Estimated Fugitive Emissions: N/	A to tons/year			
6. Emission Factor: 100% Emitted	7. Emissions			
Reference:	Method Code:			
8. Calculation of Emissions (limit to 600 chara				
o. Calculation of Emissions (mine to ooo chara	etcisj.			
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 = 1,39	9.7  lbs = 0.6999  tons			
Average hours of operation for $1999/2000 = 192$	26.5 hrs			
1,399.7 lbs / 1926.5 hrs = 0.7266 lbs/hr				
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 characters):			
Marked adv. 1 have a final at the VOC seed.				
Methyl ethyl ketone included in VOC total.				
Allowable Emissions Allowable Emissions N	<u>I/A</u> 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 characte	rs):			
•				
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):			
	F			
	·			

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Pollutant Detail Information Page	6	of	7

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
Н169	N/A			
3. Potential Emissions:	4. Synthetically			
17.69 lb/hour	17.04 tons/year Limited? [ ]			
5. Range of Estimated Fugitive Emissions: N/A				
[ ] 1 [ ] 2 [ ] 3	to to			
6. Emission Factor: 100% Emitted	7. Emissions Method Code:			
Reference:	Wethod Code.			
8. Calculation of Emissions (limit to 600 chara				
,				
1999: Plant Nos. 1 & 3 combined = 19,686.4 lb				
2000: Plant Nos. 1 & 3 combined = 18,362.5 lb				
Average H169 emissions for $1999/2000 = 34.0^{\circ}$				
Average hours of operation for $1999/2000 = 192$	26.5 nrs			
34,071.0 lbs / 1926.5 hrs = 17.69 lbs/hr				
Pollutant Potential/Fugitive Emissions Company	mont (limit to 200 characters);			
9. Foliulant Potential/Fugitive Emissions Com	ment (mint to 200 characters).			
Toluone 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 character	rs):			
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):			

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Pollutant Detail Information Page	7	of	7

# G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
H186	N/A			
3. Potential Emissions:		4. Synthetically		
40.48 lb/hour	38.99 tons/year	Limited? [ ]		
5. Range of Estimated Fugitive Emissions: N/2	A to tons/year			
6. Emission Factor: 100% Emitted		7. Emissions		
Reference:		Method Code: 2		
8. Calculation of Emissions (limit to 600 chara-	cters):			
1999: Plant Nos. 1 & 3 combined = 41,942.7 lb 2000: Plant Nos. 1 & 3 combined = 41,351.2 lb Average H186 emissions for 1999/2000 = 77,98 Average hours of operation for 1999/2000 = 19277,981.6 lbs / 1926.5 hrs = 40.48 lbs/hr	s + 38,064.1 lbs = 79,415 81.6 lbs = 38.99 tons			
9. Pollutant Potential/Fugitive Emissions Comm	ment (limit to 200 charac	ters):		
Xylones included in VOC total.				
Allowable Emissions Allowable Emissions N	<u>/A</u> of			
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	te of Allowable		
3. Requested Allowable Emissions and Units:	4. Equivalent Allowab	ole Emissions:		
	lb/hour to	ons/year		
5. Method of Compliance (limit to 60 character	rs):			
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to	200 characters):		

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Emissions Unit Information Section 6 of 6	
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# H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>N/A</u> of

1.	Visible Emissions Subtype:	2. Basis for Allowable Opacity:  [ ] Rule [ ] Other
3.	Requested Allowable Opacity: Normal Conditions: % Ex Maximum Period of Excess Opacity Allower	ceptional Conditions:
4.	Method of Compliance:	
5.	Visible Emissions Comment (limit to 200 c	haracters):
		MONITOR INFORMATION Subject to Continuous Monitoring)
<u>Co</u>	ntinuous Monitoring System: Continuous	Monitor N/A of
	Parameter Code: Continuous	Monitor N/A of  2. Pollutant(s):
1.		
<ol> <li>3.</li> <li>4.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information:  Manufacturer:  Model Number:	2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date:

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Emissions Unit Information Section 6 of 6

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

#### **Supplemental Requirements**

1.	Process Flow Diagram [X ] Attached, Document ID: 3H	[] N	Not Applicable	[]	Waiver Requested
2.	Fuel Analysis or Specification  [ ] Attached, Document ID:	_ [X ]	Not Applicable	[	] Waiver Requested
3.	Detailed Description of Control Equipm  [ ] Attached, Document ID:		Not Applicable	[	] Waiver Requested
4.	Description of Stack Sampling Facilitie  [ ] Attached, Document ID:		Not Applicable	[	] Waiver Requested
5.	Compliance Test Report  [ ] Attached, Document ID:  [ ] Previously submitted, Date:  [X ] 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 Construc  [ ] Attached, Document ID:			l	
9.	Other Information Required by Rule or  [ ] Attached, Document ID:				
10	Supplemental Requirements Comment:	N/A			,
١.					

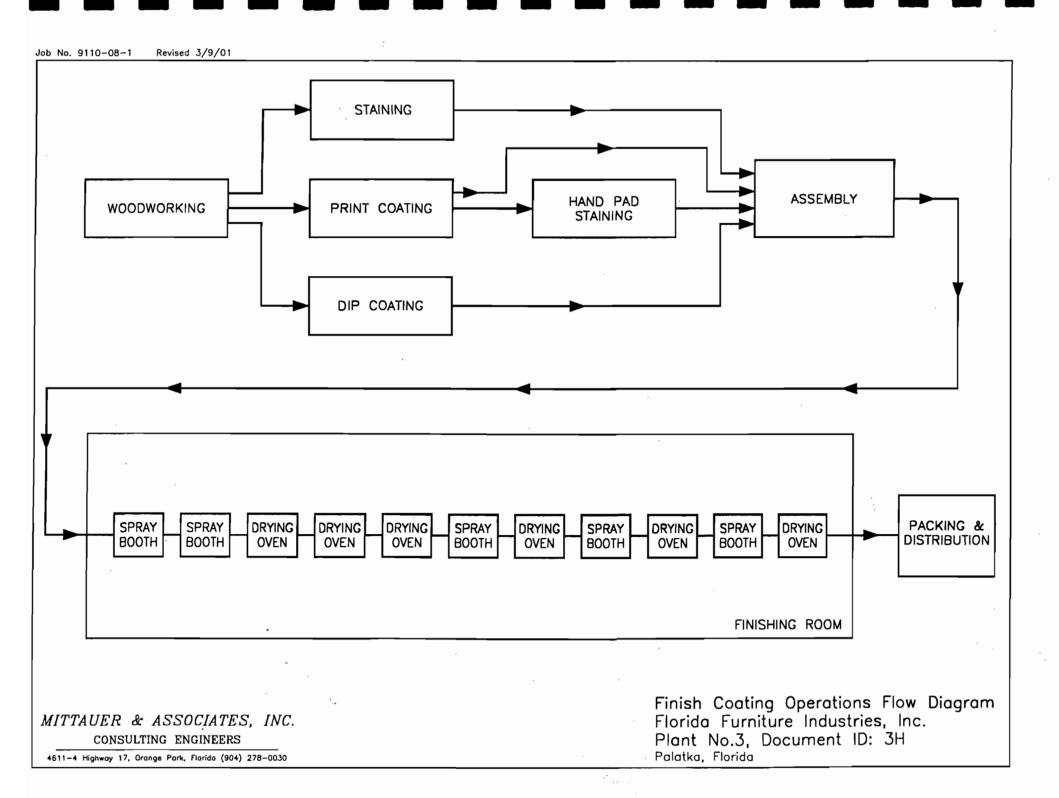
Emissions Unit Information Section 6	ot t	0
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#### Additional Supplemental Requirements for Title V Air Operation Permit Applications

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 3H**

**Finish Coating Operations Flow Diagram** 



#### MITTAUER & ASSOCIATES, INC.

LETTER OF TRANSMITTAL

CONSULTING ENGINEERS 4611-4 U.S. Highway 17 Orange Park, FL 32003

### RECEIVED

APR 04 2001

Tel: (904) 278-0030 Fax: (904) 278-0840

BURFAU	OF	AIR	REGUL	ATION

TO:	John Reynolds,		OF AIR REGULATION	<b>DATE</b> : 4-3-01	PROJECT No.: 9110-08-1
_	Bureau of Air Re	egulation - FDEP		RE: Air Permitting	]
_	Twin Towers Bu	ilding		Consolidation	n of Plant Nos. 1 & 3
	2600 Blair Stone	e Road		Florida Furni	ture Industries, Inc
_	Tallahassee, FL	32399-2400			
WE ARE S	ENDING YOU:	Attached   Und	der Separate Cover Via	<u> </u>	, the following items
☐ Plans/	Prints 🛚 Specif	ications 🏻 Origin	als	<u> </u>	
COPIES	DATE	NO.		DESCRIPTION	V
2_	3-14-01		FDEP Application for	Air Per <u>m</u> it - <b>T</b> itle V Sou	rce (signed and sealed)
					_
			_		·
	our Use 🛭 For 🗅		☑ As Requested □ Fo	, ,	or Your Review and Comment  Application for Air Permit -
Title V S	ource with regard	d to the Consolidat	tion of Plant Nos. 1 and	3 for Florida Furniture	Industries, Inc. Contact me if
you have	any questions.				
		<u> </u>			
<del>-</del>					
COPY TO	;		_ SI	GNED: Timothy P. Nor	man, P.E.

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



#### 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. Athough 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.

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: F	lorida Fu	ırniture Industries,	, Inc.
2. Site Name: Plant No. 1 and Plant N	No. 3		
3. Facility Identification Number: 10	070002 ฮ	and 1070026	[ ] Unknown
4. Facility Location: Street Address or Other Locator: 7 (Plant No. 3)	'22 River	Street (Plant No.	1) and 160 Comfort Road
City: Palatka C	County: I	Putnam	Zip Code: 32177
5. Relocatable Facility? [ ] Yes [X ] No	<u>-</u>	6. Existing Perr [X ] Yes	mitted Facility?  [ ] No
Application Contact			
Name and Title of Application Con Environmental Services		nothy P. Norman,	P.E., Manager of
Application Contact Mailing Address     Organization/Firm: Mittauer & As		Inc.	
Street Address: 4611-4 U.S. Highv	way 17		
City: Orange Park	Sta	ate: FL	Zip Code: 32003
3. Application Contact Telephone Nu	mbers:		
Telephone: (904) 278-0030		Fax: (904) 2	78-0840
Application Processing Information	(DEP Us	se)	,
1. Date of Receipt of Application:			
2. Permit Number:			
3. PSD Number (if applicable):			· · · · · · · · · · · · · · · · · · ·
4. Siting Number (if applicable):			

DEP Form No. 62-210.900(1) - Form

#### Purpose of Application

#### **Air Operation Permit Application**

Ιh	15	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:
[X	]	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:
]	j	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:
Ai	r (	Construction Permit Application N/A
Th	is	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.

2

#### Owner/Authorized Representative or Responsible Official

<u>Uv</u>	viier/Authorized Representative of Re	sponsible Offici	<u>iai</u>
1.	Name and Title of Owner/Authorized F	Representative or	Responsible Official:
Wi	illiam A. Cratch, VP Operations		
2.	Owner/Authorized Representative or R Organization/Firm: Florida Furniture I	_	ial Mailing Address:
	Street Address: P.O. Box 610		
	City: Palatka	State: FL	Zip Code: 32178
3.	Owner/Authorized Representative or R	esponsible Offic	ial Telephone Numbers:
	Telephone: (904) 328-3444	Fax: (9	904) 329-5455
4.	Owner/Authorized Representative or R	esponsible Offic	ial Statement:
	I, the undersigned, am the owner or auther responsible official (check here [ application, whichever is applicable. I formed after reasonable inquiry, that the accurate and complete and that, to the reported in this application are based a emissions. The air pollutant emissions in this application will be operated and standards for control of air pollutant enand rules of the Department of Environ understand that a permit, if granted by authorization from the Department, and legal transferred any permitted emission.  Signature	J, if so) of the Tit. I hereby certify, be the statements mand best of my knowle the upon reasonable the units and air poor the maintained so a the mental Protection the Department, the I will promptly	le V source addressed in this cased on information and belief de in this application are true, ledge, any estimates of emissions techniques for calculating llution control equipment described as to comply with all applicable in the statutes of the State of Florida on and revisions thereof. I cannot be transferred without

#### **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

3

Zip Code: 32003

3. Professional Engineer Telephone Numbers:

Telephone: (904) 278-0030

Fax: (904) 278-0840

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<sup>\*</sup> Attach letter of authorization if not currently on file.

#### 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.

	Tar	3/14/01	
Signature	To the Control	Date	
(seal)	NO. 01928		

DEP Form No. 62-210.900(1) - Form

<sup>\*</sup> Attach any exception to centification statement.

#### **Scope of Application**

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
- Cinto ID			
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	00
, .			
	* 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		
	•	

6

#### II. FACILITY INFORMATION

#### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1.	Facility UTM Coor	dinates:		
	Zone: 17	East (km):	438.3 No:	rth (km): 3278.9 (Plant No. 1)
	Zone: 17	East (km):	436.4 No	rth (km): 3283.4 (Plant No. 3)
2.	Facility Latitude/Lo Latitude (DD/MM/S		ongitude (DD/MM/SS)	: 81°–38'– 5" W (Plant No. 1)
	Latitude (DD/MM/S	SS): 29°–40'–50" N L	ongitude (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	Α	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)

Zip Code: 32178

City: Palatka State: FL

3. Facility Contact Telephone Numbers:

Telephone: (904) 328-3444 Fax: (904) 328-5455

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### **Facility Regulatory Classifications**

#### Check all that apply:

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

#### **List of Applicable Regulations**

CHAPTER 62-103, F.A.C.: RULES OF
ADMINISTRATIVE PROCEDURE,
effective 12-31-95
62-103.150, F.A.C.: Public Notice of
Application and proposed Agency Action.
62-103.155, F.A.C.: Petition for
Administrative Hearing; Waiver of Right to
Administrative Proceeding.
CHAPTER 62-210, F.A.C.: STATIONARY
SOURCES - GENERAL REQUIREMENTS,
effective 3-21-96.
62-210.300, F.A.C.: Permits Required.
62-210.300(1), F.A.C.: Air Construction
Permits.
62-210.300(2), F.A.C.: Air Operation Permits.
62-210.300(3), F.A.C.: Exemptions.
62-210.300(3)(a), F.A.C.: Full Exemptions.
•

62-210.300(3)(b), F.A.C.: Temporary
Exemption.
62-210.300(5), F.A.C.: Notification of
Startup.
62-210.300(6), F.A.C.: Emissions Unit
Reclassification.
62-210.350, F.A.C.: Public Notice and
Comment.
62-210.350(3), F.A.C.: Additional Public
Notice Requirements for Facilities Subject to
Operation Permits for Title V Sources.
62-210.360, F.A.C.: Administrative Permit
Corrections.
62-210.370(3), F.A.C.: Annual Operating
Report for Air Pollutant Emitting Facility.
62-210.650, F.A.C.: Circumvention.
62-210.900, F.A.C.: Forms 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	5. Pollutant Comment
Limited	Classii.	lb/hour	tons/year	Cap	Comment
СО	В				
PM	В		_		
PM10	В		_		
VOC	A	-	374.49	OTHER	001, 002, 004, 006
H020	В				
H046	В				
H047	В	_			
H053	В				
H060	В	_			
H085	В	_			
H095	В				
Н096	В				
H113	В				
H115 H120	B B				
H123 H132	B B				,
H169 H182	A B				
H186	A				

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#### C. FACILITY SUPPLEMENTAL INFORMATION

#### **Supplemental Requirements**

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#### Additional Supplemental Requirements for Title V Air Operation Permit Applications

List of Proposed Insignificant Activities:     [ ] Attached, Document ID: [X] Not Applicable
9. List of Equipment/Activities Regulated under Title VI:
[ ] Attached, Document ID:
[ ] Equipment/Activities On site but Not Required to be Individually Listed
[X] Not Applicable
10. Alternative Methods of Operation:
[ ] Attached, Document ID: [X] Not Applicable
11. Alternative Modes of Operation (Emissions Trading):
[ ] Attached, Document ID: [X] Not Applicable
12. Identification of Additional Applicable Requirements:
[ ] Attached, Document ID: [X] Not Applicable
13. Risk Management Plan Verification:
[ ] 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:)
[ ] Plan to be submitted to CEPPO (Date required:)
[X] Not Applicable
14. Compliance Report and Plan:
[ ] Attached, Document ID: [X] Not Applicable
15. Compliance Certification (Hard-copy Required):
[ ] Attached, Document ID: [X] Not Applicable

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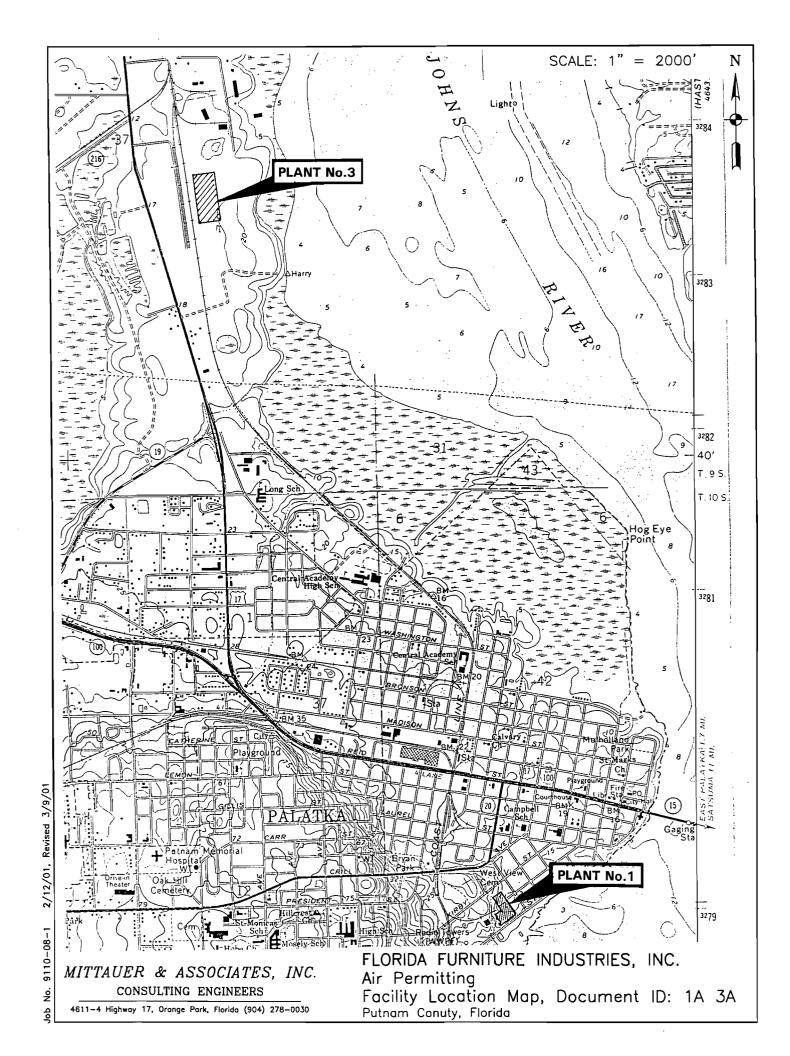
## **EXHIBITS 1A 3A**

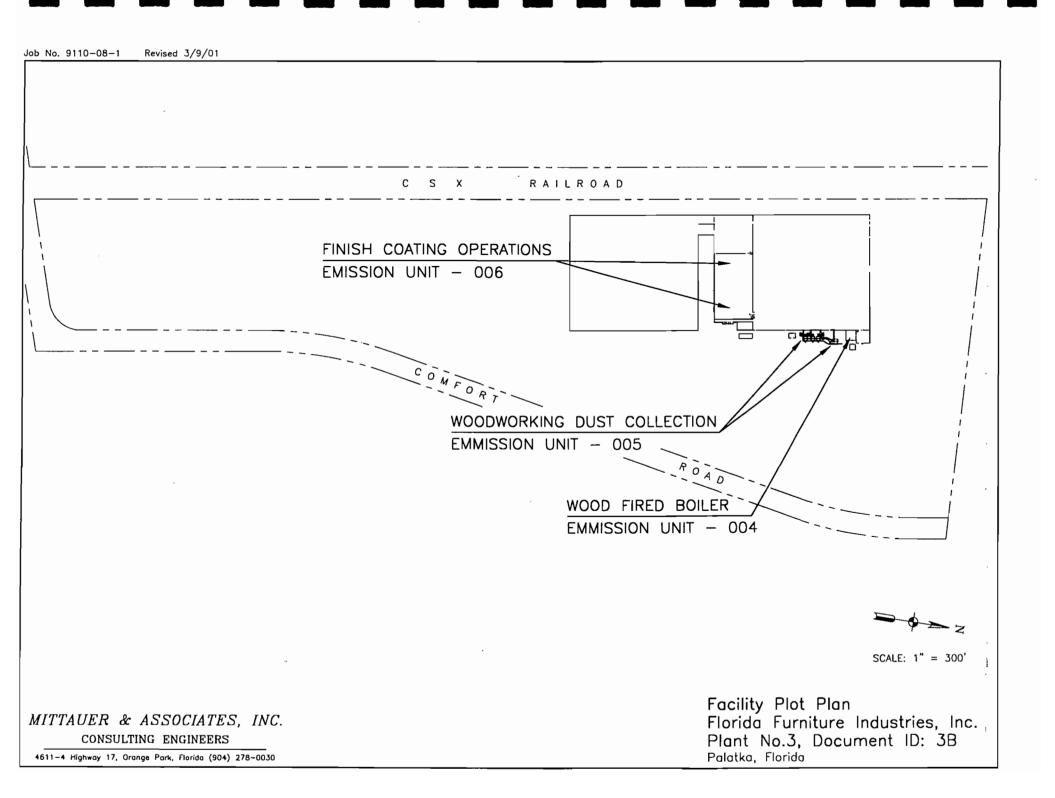
1B, 3B

1C, 3C

1D, 3D

1E, 3E

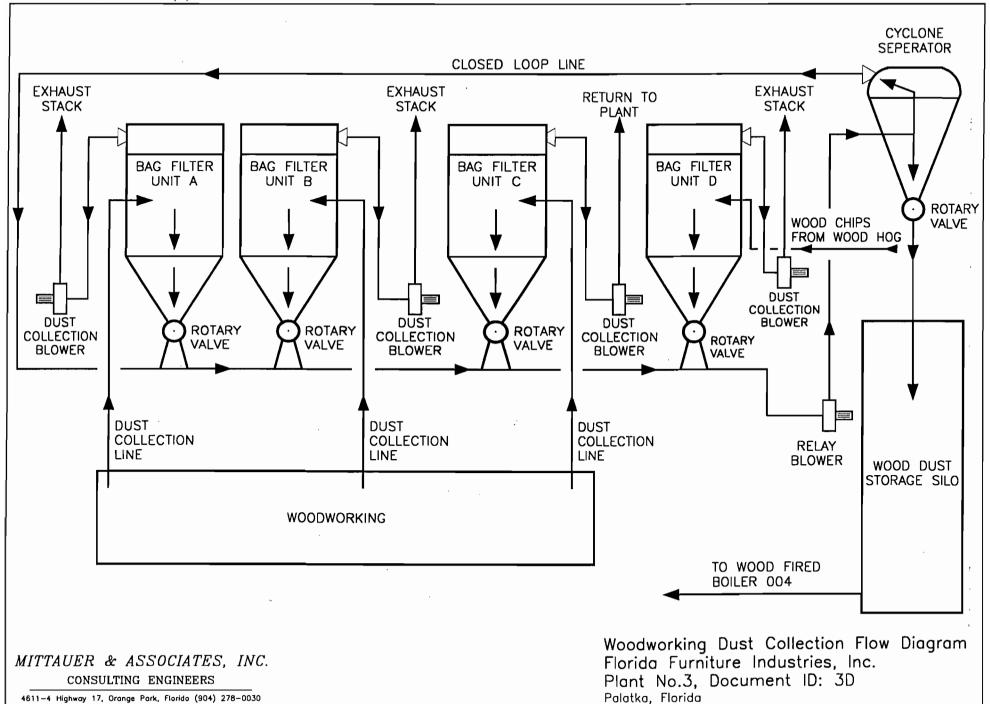




MITTAUER & ASSOCIATES, INC. CONSULTING ENGINEERS

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

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



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

Palatka, Florida

<b>Emissions</b>	Unit	Information	Section	1	$\mathbf{of}$	6 .	

#### 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 Emission	s Unit Addressed in This	s Section: (Check one)	_				
[X	[X] 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).							
[	process or prod		n addresses, as a single emis s which has at least one defi- titive emissions.					
[	[ ] 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 Unre	egulated Emissions Unit	? (Check one)					
[X	The emissions un emissions unit.	it addressed in this Emis	sions Unit Information Secti	on is a regulated				
[	] The emissions uemissions unit.	unit addressed in this Em	issions Unit Information Sec	ction is an unregulated				
3.	Description of En	nissions Unit Addressed	in This Section (limit to 60 o	characters):				
W	ood fired boiler at l	Plant No. 1						
4.	Emissions Unit Id	lentification Number:		[ ] No ID				
	ID: 001		J DI [ ]	Jnknown				
5.	Emissions Unit Status Code: A	6. Initial Startup Date: 1963	7. Emissions Unit Major Group SIC Code: 2511	8. Acid Rain Unit?				
9.	Emissions Unit C	omment: (Limit to 500 (	Characters)					
	Boiler provides steam to Plant No. 1 for heating of dry kilns and for heating of the manufacturing facility.							

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<b>Emissions</b>	Unit !	Information	Section	-1	of_	<u>6</u> .	
	~		~~~~	<u> </u>	~		_

#### **Emissions Unit Control Equipment**

Wood burning	boiler fed v	vith wood o	chips and	sawdust v	with multicy	clone fly	ash arrest	or and

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

Wood burning boiler fed with wood chips and sawdust with multicyclone fly ash arrestor and fly ash re-injection system.

2. Control Device or Method Code(s): 077

#### **Emissions Unit Details**

1.	Package Unit:	
	Manufacturer: The Bigelow Company	Model Number: HRT
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 Information Sect</b>	ion 1	of	6 .	
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## 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 Through	put Rate: 1,90	60 lb/hr	23.52 ton/day
4.	Maximum Production Rate: N	/A		
5.	Requested Maximum Operatin	g Schedule:		
		24 hours/d	ay	7 days/week
ı		52 weeks/y	/ear	8,760 hours/year
6.	Operating Capacity/Schedule C	Comment (lim	it to 200 cha	racters):
Th	roughput based on current perm	itted rate.		· · · · · · · · · · · · · · · · · · ·

Emissions	Unit	Information	Section	1	of	. 6	
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#### 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.

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

<b>Emissions</b>	Unit	<b>Information Section</b>	1 ·	of	6 ·	
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## 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.	

<b>Emissions</b>	<b>Unit Information Section</b>	1 .	of	- 6	
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# D. EMISSION POINT (STACK/VENT) INFORMATION (Regulated Emissions Units Only)

#### **Emission Point Description and Type**

1.	Identification of Point on Pl Flow Diagram? 001	ot Plan or	2. Emission Po	int Type Code:	-
3.	Descriptions of Emission Po 100 characters per point):	oints Comprising	g this Emissions (	Jnit for VE Tracking (	limit to
Во	iler stack.				
4.	ID Numbers or Descriptions	s of Emission Ur	nits with this Emi	ssion Point in Commo	n:
N/	A				
5.	Discharge Type Code:	6. Stack Heigh		7. Exit Diameter:	
	V		50 feet	3.2	e feet
8.	Exit Temperature:	9. Actual Vol	umetric Flow	10. Water Vapor:	
	491 °F	Rate:	6 600 asf	N/A	%
11.	Maximum Dry Standard Flo	w Rate:	6,600 acfm 12. Nonstack Er	nission Point Height:	
	N/A	dscfm			eet
13.	Emission Point UTM Coord	linates:			
	Zone: 17 E	ast (km): 438.3	North	n (km): 3278.9	
14.	Emission Point Comment (1	imit to 200 char	acters):		
N/	A				
					,
			·		

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Emissions Unit Information Section 1 of 6		
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## E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

1 Segment Description (Pro		
1. Segment Description (110	cess/Fuel Type) (limit to 500 ch	aracters):
Burning of sawdust and wood	chips in boiler.	
	•	
2. Source Classification Cod	le (SCC): 3. SCC Units	
1-02-009-06	Tons by	
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:	8. Maximum % Ash: 1.2	9. Million Btu per SCC Unit: 18.61
10. Segment Comment (limit	to 200 characters):	<b></b>
N/A		
Segment Description and Ra	ate: Segment of	N/A
1. Segment Description (Pro	cess/Fuel Type) (limit to 500 ch	naracters):
	2 00011	
2. Source Classification Cod	le (SCC): 3. SCC Unit	rs:
Source Classification Cod     Maximum Hourly Rate:	le (SCC):  3. SCC Unit  5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
		6. Estimated Annual Activity
4. Maximum Hourly Rate:	5. Maximum Annual Rate:  8. Maximum % Ash:	6. Estimated Annual Activity Factor:
Maximum Hourly Rate:     Maximum % Sulfur:	5. Maximum Annual Rate:  8. Maximum % Ash:	6. Estimated Annual Activity Factor:
Maximum Hourly Rate:     Maximum % Sulfur:	5. Maximum Annual Rate:  8. Maximum % Ash:	6. Estimated Annual Activity Factor:
Maximum Hourly Rate:     Maximum % Sulfur:	5. Maximum Annual Rate:  8. Maximum % Ash:	6. Estimated Annual Activity Factor:

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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

ode	Device C N/A N/A	A A	NS NS	8
	_		NS	
-	N/A	A		S
	N/A	A		
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Emissions Unit Information Section _	1_	_ of <u>6</u>	_ ** * * * *	en j - n
Pollutant Detail Information Page	1	of <u>1</u>		

# G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

### Emissions-Limited and Preconstruction Review Pollutants Only)

#### **Potential/Fugitive Emissions**

1 otentian i agitive Emissions				
1. Pollutant Emitted:	2. Total Percent Ef	•		
СО		N/A		
3. Potential Emissions:		4. Synthetically		
7.47 lb/hour	32.70 tons/year			
5. Range of Estimated Fugitive Emissions	: N/A			
[ ] 1 [ ] 2 [ ]		_ tons/year		
6. Emission Factor: 100%		7. Emissions		
Reference:		Method Code:		
	<del></del>	2		
8. Calculation of Emissions (limit to 600 c	:haracters):			
126 Hz / top v 4 900 24 tops	1 3111			
$\frac{13.6 \ lbs \ / \ ton \ x}{2000 \ lb} \ \frac{4,809.24 \ tons}{1}$	$\frac{yr}{} = 32.70 tons / yr = 7$	7.47 lbs / hr		
2000 lbs / ton				
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):				
	N/A			
Allowable Emissions Allowable Emission	os of			
1. Basis for Allowable Emissions Code:	2. Future Effective	e Date of Allowable		
	Emissions:			
3. Requested Allowable Emissions and Un	nits: 4. Equivalent Allo	owable Emissions:		
	lb/ho	ur tons/year		
5. Method of Compliance (limit to 60 char	racters):			
6. Allowable Emissions Comment (Desc.	of Operating Method) (lir	nit to 200 characters):		
(2000)	- F			

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Emissions Unit Information Section	1		of	<u>6</u>	
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# H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

(Only Regulated Emissions C.	nits Subject to a VE Emiliation
Visible Emissions Limitation: Visible Emissi	ons Limitation 1 of 1
1. Visible Emissions Subtype: VE20	Basis for Allowable Opacity:     [X] Rule     [ ] Other
Requested Allowable Opacity:     Normal Conditions: 20 % Ex     Maximum Period of Excess Opacity Allower	ceptional Conditions: 40% ed: 2 min/hour
4. Method of Compliance: Boiler operaters we VE. Any malfunction immediately reported.	ould monitor equipment functions and stack
5. Visible Emissions Comment (limit to 200 c	haracters):
N.	/A
	MONITOR INFORMATION Subject to Continuous Monitoring) Monitor N/A of
1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information:  Manufacturer:	C. ' IN I
Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200	characters):

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Emissions Unit Information Section 1 of	0	
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# J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION (Regulated Emissions Units Only)

#### **Supplemental Requirements**

1.	Process Flow Diagram [X] Attached, Document ID: 1E [] Not Applicable [] Waiver Requested	l
	<u> </u>	
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	
	[ ] 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	
	- ···•	

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Emissions Unit Information Section 1 of 6	Emissions	Unit	Information	Section	1	of	6	
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## Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation
[ ] Attached, Document ID: [X ] Not Applicable
12. Alternative M. Josef Overetive (Training Trading)
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 IE**

**Wood Fired Boiler Process Flow Diagram** 

## **EXHIBIT 1F**

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



#### 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 Uticle Che)			
Membed # 200A 2008	Othe	ــــــ	
Company Name			
Plorida Furniture -	GALO	Stric	s l
Foothy Nome			
Street Accres			
72 River Street			
PAIATRA	State L	7	20 2217-7
	-		13211
Wood Boiler	Uril #	Opinito	Prod LALA
Control Equipment	<b>_</b>	Concilia	Hode CHETT
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# 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

Jacksonville, Florida

December 6, 2000

Certificate Number

Location

Date of issue

President

Director of Training

Emissions	Unit	<b>Information Section</b>	2	of 6	
			_	UX U	

#### 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	on: (Check one)					
process or production unit, or activity, which p	[ ]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).					
process or production units and activities which	[X] 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.					
[ ] This Emissions Unit Information Section address or production units and activities which						
2. Regulated or Unregulated Emissions Unit? (Che	eck one)					
[X] The emissions unit addressed in this Emissions U emissions unit.	[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.					
[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.						
3. Description of Emissions Unit Addressed in This	s Section (limit to 60 c	characters):				
Dry kiln Nos. 3 & 4 at Plant No. 1.						
4. Emissions Unit Identification Number: [ ] No ID						
ID: 002	[ ] ID U	Inknown				
5. Emissions Unit   6. Initial Startup   7. E	missions Unit Major	8. Acid Rain Unit?				
	Group SIC Code:	[ ]				
A No. 3 8/24/84	•					
No. 4 7/24/00	2511					
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						

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Emissions Unit Information Section 2 of 6						
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

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Emissions Unit Information Section 2 of (	missions	6
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## 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 hou	rs/day		7 days/week		
	52 wee	eks/year		8,760 hours/year		
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.						
•						

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## 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.

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Emissions	Unit	Information	Section	2	of 6	
CH112210112	CILIL	IIIIVI IIIAUVII	Section	_	OI O	

## 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 Pl Flow Diagram? 002	ot Plan or	2. Emission Po	oint Type Code:	
3.	Descriptions of Emission Po 100 characters per point):	oints Comprising	g this Emissions U	Jnit for VE Tracking	(limit to
No	VE.				
4.	ID Numbers or Descriptions	s of Emission Ur	nits with this Emi	ssion Point in Comm	ion:
002	2		_		
5.	Discharge Type Code:	6. Stack Heigh		7. Exit Diameter:	foot
	R	N/A	feet	N/A	feet
8.	Exit Temperature:		umetric Flow	10. Water Vapor:	
	170 °F	Rate:	N/A acfm	N/A	%
11.	Maximum Dry Standard Flo	w Rate:		nission Point Height	
	N/A	dscfm	Kiln No. 3		feet
13.	Emission Point UTM Coord	linates:	Kiln No 4:	= 7.9	
	Zone: 17 E	ast (km): 438.3	Nort	h (km): 3283.9	
14.	Emission Point Comment (1	imit to 200 char	acters):		
Kil	n Nos. 3 and 4 emission poin	nts are wall vents	s front and rear.		
					,
			· · · · · · · · · · · · · · · · · · ·		-

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<b>Emissions</b>	Unit	Information	Section	2	of	6	
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## E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segment Description and Rate: Segment N/A of

1. Segment Description (Prod	cess/Fuel Type)	(limit to 500 ch	aract	ters):
N/A – Steam is generated by v	wood fired boiler	(001).		
2. Source Classification Code	e (SCC):	3. SCC Units	 3:	<u> </u>
N/A		N/A		· .
4. Maximum Hourly Rate: N/A	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur:	8. Maximum 9	 % Ash:	9.	Million Btu per SCC Unit:
N/A	N/A			N/A
10. Segment Comment (limit)	to 200 characters	):		
N/A				
				<u> </u>
Segment Description and Ra	ite: Segment	of	N/A	
1. Segment Description (Prod	cess/Fuel Type)	(limit to 500 ch	narac	eters):
2 S C1'S'- C-1	- (0,00)	3. SCC Unit	<b>.</b>	
2. Source Classification Cod	e (SCC):	3. SCC Unit	ıs:	
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum 9	% Ash:	9.	Million Btu per SCC Unit:
10. Segment Comment (limit	to 200 characters	):		
			-	

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<b>Emissions</b>	Unit	Informa	ation Se	ection	2	of	6	
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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1.	Pollutant Emitted	Primary Control     Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
	VOC	N/A	N/A	NS
		_		
				•
	<del> </del>			
_				
-				
_			<u></u>	
	•			
				,
_				

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Emissions Unit Information Section 2	of <u>6</u>		
Pollutant Detail Information Page1	of <u>1</u>	- -	
G. EMISSIONS UNIT POLLU (Regulated En Emissions-Limited and Precons	nissions U	nits -	
Potential/Fugitive Emissions			
1. Pollutant Emitted:	2. Total I		ency of Control:
. VOC		N/A	Ą
3. Potential Emissions:			4. Synthetically
0.44 lb/hour	1.92	tons/year	Limited? [ ]
5. Range of Estimated Fugitive Emissions: N/.	A	to to	ns/year
6. Emission Factor: 0.211 lb/1000 bdf			7. Emissions
Reference:			Method Code:
8. Calculation of Emissions (limit to 600 chara	cters):	_	
(0.211 IL WOG / 1000 L K)(200 C	00014611	Janus)	
$\frac{(0.211  lbVOC / 1000  bdf)(200,0)}{(24  hr  day^{-1})}$	100 <i>0aj</i> / 4a	$\frac{(ays)}{} = 0.44  lb$	$ohr^{-1}$
(24111 day )			
$\frac{(0.211  lb  VOC  /  1000  bdf)(18,200)}{(2000  lbs  ton^{-1})}$	,000 <i>bdf / y</i>	$(r^{-1})$	1.
$(2000 lbs ton^{-1})$		= 1.92101	ns yr
9. Pollutant Potential/Fugitive Emissions Com	ment (limit	to 200 charac	ters):
NT/			
N/	A		
Allowable Emissions Allowable Emissions	of	N/A	
Basis for Allowable Emissions Code:	2. Future Emiss		ate of Allowable
3. Requested Allowable Emissions and Units:	4. Equiv	alent Allowab	ole Emissions:
		lb/hour	tons/ýear
5. Method of Compliance (limit to 60 character	rs):		
6 Allowahla Emigricus Comment (Dec. of O	monotine NA	othod) (limit t	200 abanasta
6. Allowable Emissions Comment (Desc. of O	perating Me	zuioa) (iimit to	o 200 characters):

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Emissions Unit Information Section 2 of 6	
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## H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>N/A</u> of \_\_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity:
	[] Rule [] Other
Requested Allowable Opacity:     Normal Conditions:     Maximum Period of Excess Opacity Allowers	acceptional Conditions: % ed: min/hour
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 c	haracters):
I. CONTINUOUS	MONITOR INFORMATION
(Only Regulated Emissions Units  Continuous Monitoring System: Continuous	Subject to Continuous Monitoring)  Monitor N/A of
	-
Continuous Monitoring System: Continuous	Monitor N/A of
Continuous Monitoring System: Continuous  1. Parameter Code:	Monitor N/A of  2. Pollutant(s):
Continuous Monitoring System: Continuous  1. Parameter Code:  3. CMS Requirement:  4. Monitor Information: Manufacturer:	Monitor <u>N/A</u> of  2. Pollutant(s):  [ ] Rule [ ] Other

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<b>Emissions</b>	Unit	<b>Information Secti</b>	on 2	of	6	
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# J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION (Regulated Emissions Units Only)

## **Supplemental Requirements**

1.	Process Flow Diagram				
	[X] Attached, Document ID: 1G	[] N	lot Applicable	[]	Waiver Requested
2.	Fuel Analysis or Specification				
	[ ] Attached, Document ID:	[X]	Not Applicable	[	] Waiver Requested
	Detailed Description of Control Equipm	ont.			
3.	Detailed Description of Control Equipm  [ ] Attached, Document ID:		Not Applicable	٢	1 Waiver Requested
4.	Description of Stack Sampling Facilities			_	
	[ ] Attached, Document ID:	[X]	Not Applicable	Ĺ	] Waiver Requested
5.	Compliance Test Report				
	[ ] Attached, Document ID:	_			
	Previously submitted, Date:	_			
	•				
	[X ] Not Applicable				
6.	Procedures for Startup and Shutdown				
	[ ] Attached, Document ID:	[X]	Not Applicable	[	] Waiver Requested
7	Operation and Maintenance Plan				<u> </u>
'`	[ ] Attached, Document ID:	[X ]	Not Applicable	ſ	1 Waiver Requested
8.	Supplemental Information for Construct				
	[ ] Attached, Document ID:	[X]	Not Applicable		
9.	Other Information Required by Rule or S	Statute	<del></del>		
	[ ] Attached, Document ID:				
10	Supplemental Paguinamenta Commenta				
10.	Supplemental Requirements Comment:				
		N/A			,

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## 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 1G**

**Dry Kiln Process Flow Diagram** 

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

Palatka, Florida

<b>Emissions</b>	Unit	<b>Information</b>	Section	3	of	6	
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#### 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)						
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).						
]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.						
[ ] 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)						
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.						
[ ] 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: [ ] No ID						
ID: 003 [ ] ID Unknown						
5. Emissions Unit   6. Initial Startup   7. Emissions Unit Major   8. Acid Rain Unit?						
Status Code: Date: Group SIC Code: [ ]						
A Bag Filters 7/89						
Cyclone 4/97 2511						
9. Emissions Unit Comment: (Limit to 500 Characters)						
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.						

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## Emissions Unit Information Section 3 of 6

## **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

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<b>Emissions Unit Information Section</b>	3	of	6	
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#### **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**

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# 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 Through	put Rate: 5,236 lb/hr	
4. Maximum Production Rate: N	/A	
5. Requested Maximum Operatin	g Schedule:	
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule C	Comment (limit to 200 c	characters):
Systems, Statesville, NC, (704) 87 estimated at 2,615 lb/hr.	73-9998. Current throug	hput based on year 2000 data is
	v	

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# 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.

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Emissions Unit Information Section 3 of	6	
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## 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.	

Emissions Unit Information Section 3 of 6

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

## **Emission Point Description and Type**

1. Identification of Point on Pl	ot Plan or	2. Emission Po	oint Type Code:	
Flow Diagram? 003			3	
	<del></del>			
<ol> <li>Descriptions of Emission Por 100 characters per point):</li> <li>Clean air discharge point</li> <li>Clean air discharge point</li> <li>Cyclone has no emission</li> </ol>	t on Bag Filter I t on Bag Filter I	Jnit A. Jnit B.		limit to
4. ID Numbers or Descriptions	s of Emission Ui	nits with this Emi	ssion Point in Commo	n:
N/A				
5. Discharge Type Code:	6. Stack Heig	ht·	7. Exit Diameter:	
H	N/A	feet	N/A	feet
	1 2			
8. Exit Temperature:	9. Actual Vol	umetric Flow	10. Water Vapor:	
77 °F	Rate:			
		N/A acfm	N/A	%
11. Maximum Dry Standard Flo			mission Point Height:	
N/A	dscfm	Filters A &	B = 50 feet	
13. Emission Point UTM Coord	linates:			
Zone: 17 E	ast (km): 438.3	Nort	h (km): 3278.9	
14. Emission Point Comment (I	imit to 200 char	acters):		
N/A				,

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Emissions Unit Information Section 3	of 6
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# E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segment Description and Rate: Segment N/A of \_\_\_\_\_

organia Debet prior and 14			_	
1. Segment Description (Process/Fuel Type) (limit to 500 characters):				
N/A				
2 Source Classification Cod	· (SCC)	3. SCC Units		
2. Source Classification Code N/A	e (SCC):	N/A		
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity
N/A 7. Maximum % Sulfur:	N/A  8. Maximum %	4 Ash:	Q	Factor: N/A Million Btu per SCC Unit:
N/A	N/A		3.	N/A
10. Segment Comment (limit to	to 200 characters)	:		
N/A				
IN/A				
Segment Description and Ra	ite: Segment	of		
Segment Description (Proc			narac	eters):
ar o ogmon 2 openpuon (1 to	jessi usi -jp: /	(		,
2. Source Classification Cod	e (SCC):	3. SCC Unit	:s:	
			<del></del>	
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum 9	% Ash:	9.	Million Btu per SCC Unit:
10. Segment Comment (limit	to 200 characters)	):		

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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

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

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Emissions Unit Information Section	3	_ of _	6	
Pollutant Detail Information Page	1	of	1	

## G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

## Potential/Fugitive Emissions

1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
PM/PM10	99.96
3. Potential Emissions: 2.09 lb/hour	9.17 tons/year 4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: N/  [ ] 1 [ ] 2 [ ] 3	A to tons/year
6. Emission Factor: 0.04 %	7. Emissions
Reference: Manufacturer's data.	Method Code:
8. Calculation of Emissions (limit to 600 chara	acters):
5,236 lb/hr x 0.0	14% = 2.09 lb/hr
$\frac{2.09  lb  /  hr  x  8,760  hrs}{2000  lbs  /  top}$	s/yr
2000 lbs / ton	= 9.17 tons / yr
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 characters):
N	'A
•	•
	<u> </u>
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 characte	rs):
·	
	<del></del>
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):

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Emissions Unit Information Section 3 of	<u>6</u>	
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# H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>N/A</u> of \_\_\_\_\_

1.	Visible Emissions Subtype:	2.	Basis for Allowable O	pacity:
	VE 20		[X] Rule	[ ] Other
3.	Requested Allowable Opacity: Normal Conditions: 20% Ex Maximum Period of Excess Opacity Allower	-	ional Conditions: N/A N/A	n % min/hour
	I. Method of Compliance: Testing of VE at minimum of 90% of opera	ting	rate.	
5.	Visible Emissions Comment (limit to 200 c	hara	cters):	
	N	/A		
<u>C</u>	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous	Sub	•	
<u>Ca</u>	(Only Regulated Emissions Units	<b>Sub</b> Mor	ject to Continuous M	
1. 3.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous	<b>Sub</b> Mor	nitor N/A of Pollutant(s):	
1.	(Only Regulated Emissions Units ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	<b>Sub</b> Mor	pject to Continuous M nitor N/A of Pollutant(s):	onitoring)
3.	(Only Regulated Emissions Units Ontinuous Monitoring System: Continuous Parameter Code:  CMS Requirement:  Monitor Information:	Sub Mor 2.	nitor N/A of Pollutant(s):	Onitoring)

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 3 of 6

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

## **Supplemental Requirements**

1.	Process Flow Diagram			
	[X] Attached, Document ID: 1D []	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: 1H			
	[ ] 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			
9.	Other Information Required by Rule or State	ite		-
	[ ] Attached, Document ID: [X			
10.	Supplemental Requirements Comment:		_	_
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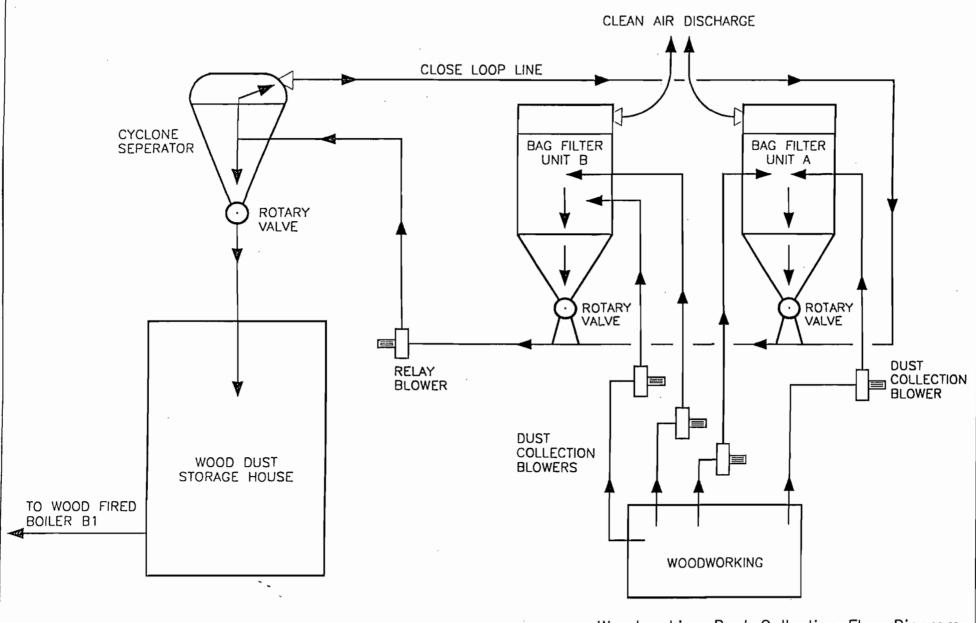
<b>Emissions</b>	Unit	Information	Section	3	of	6	
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## Additional Supplemental Requirements for Title V Air Operation Permit Applications

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
[A ] Not Applicable

## **EXHIBIT 1D**

**Woodworking Dust Collection Flow Diagram** 



MITTAUER & ASSOCIATES, INC.

CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florido (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



#### 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

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# 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

Jacksonville, Florida

December 6, 2000

Certificate Number

Location

Date of Issue

( Viranas Host

President

Director of Training

<b>Emissions</b>	Unit	Information	Section	4	of	6	
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#### 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 a	and Status						
1. Type of Emissions Unit A	ddressed in This	Section: (Check one)					
process or production un	[X] 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).						
[ ]This Emissions Unit Information under process or production under the control of the control	nits and activities	s which has at least one defin	ons unit, a group of nable emission point				
[ ] 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)					
[X] The emissions unit address emissions unit.	[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.						
[ ] The emissions unit addre emissions unit.	essed in this Em	issions Unit Information Sec	ction is an unregulated				
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 Identificat ID: 001 (Renumber to 004			[ ] No ID [ ] ID Unknown				
5. Emissions Unit Status Code: Date A	ial Startup e: 12/85	7. Emissions Unit Major Group SIC Code: 2511	8. Acid Rain Unit?				
9. Emissions Unit Comment:	: (Limit to 500 C	Characters)					
Boiler provides steam to plant the manufacturing facility.	for drying oven	s in the finish coating opera	tion and for heating of				

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<b>Emissions Unit Information Section</b>	4	of	6	
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## **Emissions Unit Control Equipment**

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Wood hurnin	a boiler fed by wood	d chine and eawd	net with multi-eve	IONE HIV ASH AF	restar

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

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	

Emissions	Unit	Informa	tion	Section	4	of	6	
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# B. EMISSIONS UNIT CAPACITY INFORMATION (Regulated Emissions Units Only)

## **Emissions Unit Operating Capacity and Schedule**

1.	Maximum Heat Input Rate:	8.74			mr	nBtu/hr
2.	Maximum Incineration Rate:	N/A	lb/hr		tor	ns/day
3.	Maximum Process or Throughpu	ıt Rate:	1,068 lb/hr	12.82	tons/day	
4.	Maximum Production Rate: N/A	A				
5.	Requested Maximum Operating	Schedu	le:			<del></del>
	24 hours/day					7 days/week
		52 wee	eks/year			8,760 hours/year
6.	Operating Capacity/Schedule Co	mment	(limit to 200	characte	ers):	·
Ca	pacity based on original permitted	I 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.

DEP Form No. 62-210.900(1) - Form

<b>Emissions</b>	Unit	Infor	mation	Section	4	of	6	
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## **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.	

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Emissions Unit Information Section 4 of 6

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

## **Emission Point Description and Type**

1.	Identification of Point on Pl Flow Diagram? 004	ot Plan or	2. Emission Po	int Type Code:	
3.	Descriptions of Emission Po 100 characters per point): Boiler stack.	oints Comprising	g this Emissions U	Jnit for VE Tracking (l	limit to
4.	ID Numbers or Descriptions	s of Emission U	nits with this Emi	ssion Point in Common	n:
N/.	A				
5.	Discharge Type Code:	6. Stack Heig	ht: feet	7. Exit Diameter:	feet
	V	35	leet	1.8	ieet
8.	Exit Temperature:	9. Actual Vol	umetric Flow	10. Water Vapor:	
	450 °F	Rate:	.700 acfm	N/A	%
11.	Maximum Dry Standard Flo			mission Point Height:	70
	N/A	dscfm	N/A		feet
13.	Emission Point UTM Coord	linates:			
	Zone: 17 E	ast (km): 436.3	North	h (km): 3283.6	
14.	Emission Point Comment (l	imit to 200 char	acters):		
N/	A				
	•				
					,
					•

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Emissions	Unit	Information	Section	4	of 6	
Emissions	Unit	iniormation	Section	4	01 0	)

# 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	Burning of sawdust and wood chips in boiler.						
2. Source Classification Code	e (SCC): 3. SCC Uni	its:					
1-02-009-06	tons b	ourned					
4. Maximum Hourly Rate: 0.54	5. Maximum Annual Rate: N/A	6. Estimated Annual Activity Factor: N/A					
7. Maximum % Sulfur:	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 Ra	ate: Segment N/A of						
1. Segment Description (Prod	cess/Fuel Type) (limit to 500	characters):					
2. Source Classification Code	e (SCC): 3. SCC Ur	nits:					
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):						
<u> </u>	·						

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# F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	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
			,

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Pollutant Detail Information Page		_ _ of _	_	

## G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A	
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour	4. Synthetically tons/year Limited? [ ]
5. Range of Estimated Fugitive Emissions: N/	•
[ ] 1 [ ] 2 [ ] 3 6. Emission Factor:	to tons/year 7. Emissions
Reference: Manufacturer's data.	Method Code:
8. Calculation of Emissions (limit to 600 chara	acters):
9. Pollutant Potential/Fugitive Emissions Com	ment (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 characte	ers):
	Not built and
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):

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Emissions only ination section 4 of 0	Information Section 4 of 6
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## H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

- "		ons Limitation 1 of 1	
1.	Visible Emissions Subtype:	2. Basis for Allowable Opacity:	
	VE 20	[X] Rule [ ] Other	
3.	Requested Allowable Opacity:		
		ceptional Conditions: 40%	
	Maximum Period of Excess Opacity Allowe		ur
	Stack VE. Annual VE test. Any malfunction	in immediately reported.	
	<ul><li>I. Method of Compliance:</li><li>Boiler operators monitor equipment functio</li></ul>	ns and stack VE Annual VE test Any	
	malfunction immediately reported.	is and stack v.D. Panidai v.D. test. Piny	
5.	Visible Emissions Comment (limit to 200 c	naracters):	
	(		
	N	'A	
	I. CONTINUOUS	MONITOR INFORMATION	
	(Only Regulated Emissions Units		
C	` •	Ç,	
	entinuous Monitoring System: Continuous	Monitor <u>N/A</u> of	- • • •
	` •	Ç,	
	Parameter Code:	Monitor N/A of  2. Pollutant(s):	
3.	Parameter Code:  CMS Requirement:	Monitor N/A of  2. Pollutant(s):	
1.	Parameter Code:  CMS Requirement:  Monitor Information:	Monitor N/A of  2. Pollutant(s):	
3.	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other	
<ol> <li>3.</li> <li>4.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:	
3.	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date	
<ol> <li>3.</li> <li>4.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Monitor N/A of  2. Pollutant(s):  [ ] Rule [ ] Other  Serial Number:  6. Performance Specification Test Date	

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Emissions Unit Information Section 4 of 6

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

## **Supplemental Requirements**

1.	Process Flow Diagram				
	[X] Attached, Document ID: 3E	[] N	lot Applicable	[]	Waiver Requested
2.	Fuel Analysis or Specification			_	
	[ ] Attached, Document ID:	_{X}	Not Applicable	l	] Waiver Requested
3.	Detailed Description of Control Equipme				
	[ ] 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 Construct	tion Pe	ermit Application	l	
	[ ] Attached, Document ID:	_[X ]	Not Applicable		
9.	Other Information Required by Rule or	Statute			
	[ ] Attached, Document ID:				
10	Supplemental Requirements Comment:				
		N/A			,
		IN/A			

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Emissions only information section 4 of o	s Unit Information Section 4 of 6
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## 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

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### **EXHIBIT 3E**

**Wood Fired Boiler Process Flow Diagram** 

#### Exhibit 3F

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

#### SOURCE TEST REPORT

#### VISIBLE EMISSIONS TESTING

#### FROM

PLANT 3
FLORIDA FURNITURE INDÚSTRIES
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

FFI FIRST AID

TEL:9043295455

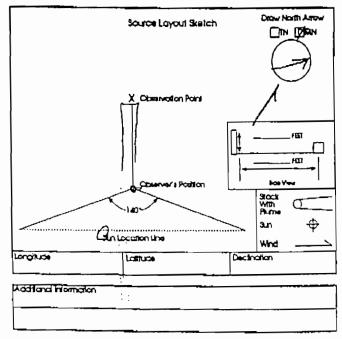
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#### VISIBLE EMISSION OBSERVATION FORM 1

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son 145 - 285°	for Point from Emission Point Surve
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## 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.

287499

Jacksonville, Florida

Десетвет 6, 2000

Conflicate Number

Ledalica

Octa of Issue

Director of Training

President

<b>Emissions</b>	Unit	Information	Section	5	of	6	
		TILL OF TIMES AND THE		_		•	

#### 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)								
[X] 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).								
[ ]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.								
[ ] 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)								
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.								
[ ] 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: [ ] No ID ID: 002 (renumber to 005) [ ] ID Unknown								
5. Emissions Unit Startup Status Code: Date: Group SIC Code: [ ]  A 12/85 7. Emissions Unit Major Group SIC Code: [ ]								
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.								

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<b>Emissions</b>	Unit	Information	Section	5	of	.6	

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:		٥F

<b>Emissions</b>	Unit	<b>Information</b>	Section	5	of.	6	
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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

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<b>Emissions</b>	<b>Unit Information Section</b>	5	of	6	_
	Chit Inioi mation Section		_ ~-		

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

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<b>Emissions Unit Information Section</b>	5	of	6	
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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:		٥F

<b>Emissions</b>	Unit	<b>Information Section</b>	5	of	6	

## 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 Through	put Rate: 6,958 lb/h	r (total all 4 units)
4. Maximum Production Rate: 1	N/A	
5. Requested Maximum Operation	ng Schedule:	
	24 hours/day	7 days/week
	52 weeks/year	8,760 hours/year
6. Operating Capacity/Schedule	Comment (limit to 20	00 characters):
Total capacity of 6,958 lb/hr as per Systems, Statesville, NC, (704) 8	_	n with Chas Campbell of Clean Air

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Emissions Unit Info	rmation Section	5 .	of.	6	
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#### 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.

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#### **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 Pl	ot Plan or	2. Emission Po	oint Type Code:					
Flow Diagram? 005			3					
2 Descriptions of Emission De	into Comprisino	this Emissions I	Init for VE Tracking (1	imit to				
3. Descriptions of Emission Po 100 characters per point):	omprism	g this Emissions (	omition ve tracking (i	iiiit to				
Clean air discharge point	t on Bag Filter A	A at Plant No. 3.						
2. Clean air discharge poin	_							
3. Clean air return to plant	_							
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:								
DI/A								
N/A								
5. Discharge Type Code:	6. Stack Heig	ht:	7. Exit Diameter:					
Filters A & B = V	Filters A, B, &	C = 26 feet	Filters A, B, & $C = 3$ .	8 feet				
Filters C & D = P	Filter D = 24 fe		Filter D = 3.3 feet					
8. Exit Temperature:	9. Actual Vol		10. Water Vapor:					
All Filters = 77°F		A = 50,287	NT/A	%				
	Filter B = $54,709$ acfm N/A							
	Filter $C = 54,2$							
	Filter D = $24,5$	oo aciiii						
11. Maximum Dry Standard Flo	w Rate:	12. Nonstack Er	mission Point Height:					
N/A	dscfm	N/A		feet				
12 F :- '- ' P : 4 UTP ( C	1*							
13. Emission Point UTM Coord	inates:							
Zone: 17 E	ast (km): 436.4	Nort	h (km): 3283.4					
14. Emission Point Comment (1	imit to 200 char	acters):						
,		ŕ						
N/A								
				,				

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<b>Emissions Unit Information Section</b>	5	of	6	
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## E. SEGMENT (PROCESS/FUEL) INFORMATION (All Emissions Units)

Segment Description and Rate: Segment N/A of \_\_\_\_\_

1. Segment Description (Pro-	1. Segment Description (Process/Fuel Type) (limit to 500 characters):				
	and a grant and a construction (a construction of the construction				
Burning of sawdust and wood	chips in boiler.				
2. Source Classification Cod	e (SCC):	3. SCC Units	<del></del>		
	1	tons bu	_		
4. Maximum Hourly Rate:	5. Maximum A	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 Ra	ate: Segment N	/A of			
Segment Description (Pro			nara <i>c</i>	terc)	
1. Segment Description (110	cess/ruerrype)	(mini to 500 Ci	iaiac	, ters).	
2 Source Classification Cod	- (SCC)-	3. SCC Unit	·		
2. Source Classification Cod	le (SCC):	3. Sec on	is.		
4. Maximum Hourly Rate:	5. Maximum	Annual Rate:	6.	Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum (	8. Maximum % Ash:		Million Btu per SCC Unit:	
10. Segment Comment (limit	to 200 characters	):			

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Emissions Unit Information Section 5	OI	0			
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## F. EMISSIONS UNIT POLLUTANTS (All Emissions Units)

1. Pollutant Emitted	Primary Control     Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM 10	101	0	NS
			1.2
-			
-			,

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section _	5	_ of _	6	
Pollutant Detail Information Page	1	of	1	

## G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

#### Potential/Fugitive Emissions N/A

rotential/rugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficie	ency of Control:		
PM/PM10	99.96			
3. Potential Emissions:		4. Synthetically		
2.78 lb/hour	12.19 tons/year	Limited? [ ]		
5. Range of Estimated Fugitive Emissions: N/		ns/year		
6. Emission Factor:		7. Emissions		
Reference: Manufacturer's data.		Method Code: 2		
8. Calculation of Emissions (limit to 600 chara	cters):			
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 to	n/yr			
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 charac	ters):		
N/	'A			
Allowable Emissions Allowable Emissions	of N/A			
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	ate of Allowable		
3. Requested Allowable Emissions and Units:	4. Equivalent Allowal	ole Emissions:		
	lb/hour	tons/year		
5. Method of Compliance (limit to 60 characte	rs):			
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to	o 200 characters):		

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section <u>5</u>		ot .	. <u>6</u>	
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## H. VISIBLE EMISSIONS INFORMATION (Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

visible Emissions Chaltation:	VISIBLE EIIIISS	ions Emination _1_ or _	
1. Visible Emissions Subtype:		2. Basis for Allowable	Opacity:
VE 20		[X] Rule	Other
3. Requested Allowable Opacity	7.*	[21] 1000	
Normal Conditions:		ceptional Conditions:	N/A%
		•	min/hour
Maximum Period of Excess C	pacity Allow	eu:	mmmour
4. Method of Compliance:			
Testing of VE at minimum of	90% of opera	ating rate.	
		<u> </u>	
5. Visible Emissions Comment	(limit to 200 c	characters):	
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	IN	1/A	
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(Only Regulated En  Continuous Monitoring System  1. Parameter Code:  3. CMS Requirement:  4. Monitor Information:     Manufacturer:     Model Number:	nissions Units	Subject to Continuous  Monitor N/A of  2. Pollutant(s):  [ ] Rule [  Serial Number:	Monitoring) ] Other
(Only Regulated En  Continuous Monitoring System  1. Parameter Code:  3. CMS Requirement:  4. Monitor Information: Manufacturer:	nissions Units	Subject to Continuous  Monitor N/A of  2. Pollutant(s):  [ ] Rule [	Monitoring) ] Other
(Only Regulated En  Continuous Monitoring System  1. Parameter Code:  3. CMS Requirement:  4. Monitor Information:     Manufacturer:     Model Number:  5. Installation Date:	nissions Units	Subject to Continuous  Monitor N/A of  2. Pollutant(s):  [ ] Rule [  Serial Number:  6. Performance Specif	Monitoring) ] Other
(Only Regulated En  Continuous Monitoring System  1. Parameter Code:  3. CMS Requirement:  4. Monitor Information:     Manufacturer:     Model Number:	nissions Units	Subject to Continuous  Monitor N/A of  2. Pollutant(s):  [ ] Rule [  Serial Number:  6. Performance Specif	Monitoring) ] Other
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DEP Form No. 62-210.900(1) - Form

Emissions	Unit	Inforn	nation	Section	5	of	6	

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

#### **Supplemental Requirements**

:	1.	Process Flow Diagram						
		[X] Attached, Document ID: 3D	_[] N	lot Ap	plicable 	[,]	W	aiver Requested
1	2.	Fuel Analysis or Specification	[37.1	NT-4	A1: a = 1-1 -	г	,	W/-i Downstad
		[ ] Attached, Document ID:	_ [X ]	NOT A	Applicable	L	]	waiver Requested
:	3.	Detailed Description of Control Equipm		NT.4	A 1: 1. 1 .	г	7	W. ' D 1
		[ ] Attached, Document ID:	[X]	Not A	Applicable	L	J	waiver Requested
-	4.	Description of Stack Sampling Facilitie						
		[ ] Attached, Document ID:	_ [X ]	Not A	Applicable	[	]	Waiver Requested
[:	5.	Compliance Test Report						<del></del> -
		[X] Attached, Document ID: 3G						
		[ ] Previously submitted, Date:			_			
		[ ] Not Applicable						
[	5.	Procedures for Startup and Shutdown						
		[ ] Attached, Document ID:	_ [X ]	Not A	Applicable	[	]	Waiver Requested
<b>!</b>	7.	Operation and Maintenance Plan			·			
		[ ] Attached, Document ID:	_ [X ]	Not A	Applicable	[.	]	Waiver Requested
[	8.	Supplemental Information for Construc	tion Pe	ermit A	Application			
		[ ] Attached, Document ID:	_ [X ]	Not A	Applicable			
9	9.	Other Information Required by Rule or	Statute	•				<u>-</u>
		[ ] Attached, Document ID:	_[X ]	Not A	Applicable			
	10.	Supplemental Requirements Comment:			•			
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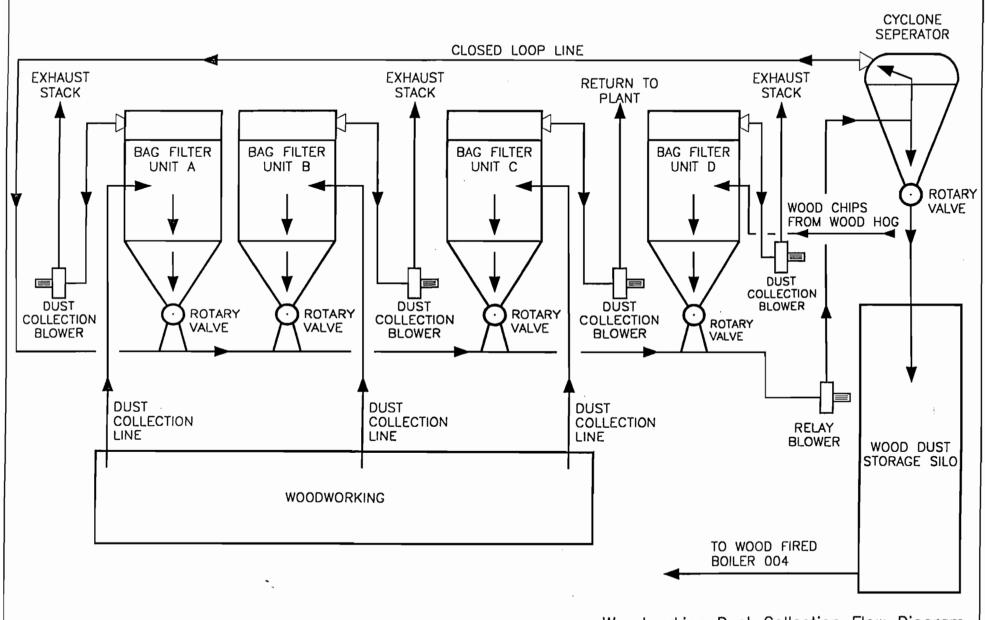
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#### Additional Supplemental Requirements for Title V Air Operation Permit Applications

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 3D**

**Woodworking Dust Collection Flow Diagram** 



MITTAUER & ASSOCIATES, INC. CONSULTING ENGINEERS

4611-4 Highway 17, Orange Park, Florido (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

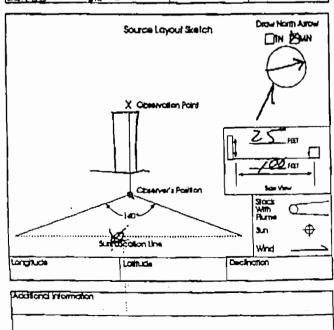
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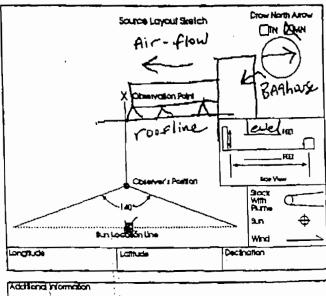
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#### VISIBLE EMISSION OBSERVATION FORM 1

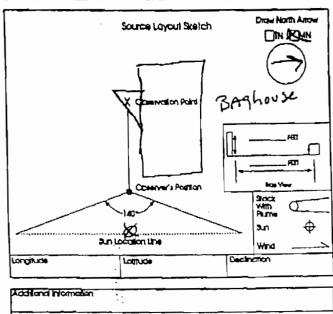
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## VISIBLE EMISSIONS **EVALUATOR**

FFI FIRST AID

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

Jacksonville, Florida

December 6, 2000

Conflicate Number

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Date of Issue

President

<b>Emissions</b>	Unit	Information	Section	6	of	6
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#### 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**

Type of Emissions Unit Addressed in This Section: (Check one)					
[ ] 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).					
[X] 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.					
[ ] 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)					
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.					
[ ] 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: [ ] No ID ID: 003 (to be renumbered to 006) [ ] ID Unknown					
5. Emissions Unit Status Code: A 12/85 7. Emissions Unit Major Group SIC Code: A 2511 8. Acid Rain Unit? [ ] [ ]					
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.					

DEP Form No. 62-210.900(1) - Form

<b>Emissions</b>	Unit	Information Section	6	of	6.	

1.	Control Equipm	ent/Method Descri	ption (Limit to 200 c	characters per device of	or method):
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- 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

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

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

#### **Emissions Unit Operating Capacity and Schedule**

Maximum Incineration Rate: N/A lb/hr tons/day     Maximum Process or Throughput Rate: 240 Furniture Units/hr     Maximum Production Rate: N/A     Requested Maximum Operating Schedule:     8 hours/day 5 days/week				
Maximum Production Rate: N/A     Requested Maximum Operating Schedule:				
5. Requested Maximum Operating Schedule:				
8 hours/day 5 days/week				
o nours, day				
52 weeks/year 1,926.5 hours/year				
6. Operating Capacity/Schedule Comment (limit to 200 characters):				
6. Operating Capacity/Schedule Comment (limit to 200 characters):  VOC Emissions from Finish Coating Operations  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 =   378.30 tons + 364.79 tons  Average hourly emissions rate =   1925 hrs + 1928 hrs  (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.

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<b>Emissions</b>	Unit	Information	Section	6	of	6	
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#### **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.	

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

#### **Emission Point Description and Type**

1. Identification of Point on Plot Plan or		2. Emission Po		
Flow Diagram? 006		3, 4		
3. Descriptions of Emission Po 100 characters per point):	oints Comprising	g this Emissions U	Jnit for VE Tracking	(limit to
No VE				
4. ID Numbers or Descriptions	s of Emission Ur	nits with this Emi	ssion Point in Comm	on:
N/A			•	
5. Discharge Type Code: F,V	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	9. Actual Volumetric Flow Rate:		10. Water Vapor:	
Ovens = $125^{\circ}F$	(See Field 14)	acfm	N/A	%
11. Maximum Dry Standard Flow Rate: N/A dscfm  12. Nonstack Emission Point Height: Fugitive Sources = 4 feet				
13. Emission Point UTM Coord	linates:		-	
Zone: 17 E	ast (km): 436.4	Nortl	n (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				

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

Segment Description and Rate: Segment of				
1. Segment Description (Prod	cess/Fuel Type) (limit	to 500 cha	racters):	
N/A – Steam heat is generated	by Wood Fired Boiler	(004).		
2. Source Classification Cod	e (SCC): N/A 3. S	SCC Units:		
		tons bur	ned	
4. Maximum Hourly Rate: N/A	5. Maximum Annua N/A	al Rate:	6. Estimated Annual Activity Factor: N/A	
7. Maximum % Sulfur: N/A	8. Maximum % Ash N/A	1;	9. Million Btu per SCC Unit: N/A mmbtu/ton	
10. Segment Comment (limit	to 200 characters):			
N/A				
Segment Description and Ra	te: Segment N/A o	f		
1. Segment Description (Pro-	cess/Fuel Type) (limi	t to 500 ch	aracters):	
		-		
2. Source Classification Cod	e (SCC): 3	SCC Units	······································	
4. Maximum Hourly Rate:	5. Maximum Annua	al Rate:	6. Estimated Annual Activity Factor:	
7. Maximum % Sulfur:	8. Maximum % Ash	1:	9. Million Btu per SCC Unit:	
10. Segment Comment (limit	to 200 characters):	_		
			·	

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# 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
VOC	IN/A	IV/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
	· ·		
	-		
			,
		-	
3			

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### G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficie	ency of Control:		
VOC	0			
3. Potential Emissions:		4. Synthetically		
385.7 lb/hour	371.55 tons/year	Limited? [X]		
5. Range of Estimated Fugitive Emissions: N/		ns/year		
6. Emission Factor: 100% Emitted		7. Emissions		
Reference:		Method Code:		
Reference:		2		
8. Calculation of Emissions (limit to 600 chara	icters):			
1999: Plant Nos. 1 & 3 combined = 378.30 ton				
2000: Plant Nos. 1 & 3 combined = 364.79 ton				
Average total VOC Emissions for 1999/2000 =		ons		
Average hours of operation for $1999/2000 = 192$				
371.55 tons / 1926.5 hrs = 0.1929 tons/hr = 385	./ IDS/III			
	·			
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 charac	ters):		
WOO I I I I I I I I I I I I I I I I I I	11 / 1 / 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	TIAD		
VOC emission rates include pollutants which ar	e listed as both VOC and	HAP.		
Allowable Emissions Allowable Emissions	1 of7			
1. Basis for Allowable Emissions Code:	2. Future Effective Da	ate of Allowable		
OTHER	Emissions: 8/1/01			
3. Requested Allowable Emissions and Units:	4. Equivalent Allowal	ole Emissions:		
371.55 tons/yr	385.7 lb/hour 371.5	55 tons/year		
5. Method of Compliance (limit to 60 characte	rs):			
Tracking of VOC emissions using REGMET 6.0 based on chemical usage.				
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to	o 200 characters):		
(= 121 12 1 parameters).				
N/A				

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## G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
H085	N/A			
3. Potential Emissions:	4.	Synthetically		
9.386 lb/hour	9.041 tons/year	Limited? [ ]		
5. Range of Estimated Fugitive Emissions: N/	A to tons/y			
[ ] 1 [ ] 2 [ ] 3 6. Emission Factor: 100% Emitted		Emissions		
	''	Method Code:		
Reference:		2		
8. Calculation of Emissions (limit to 600 chara	cters):			
1000. Plant No. 1 % 2 combined = 0.792.5 lbs	+ 7 005 7 lbs - 17 770 2 lbs	- 9 90 tons		
1999: Plant Nos. 1 & 3 combined = 9,783.5 lbs 2000: Plant Nos. 1 & 3 combined = 9,610.5 lbs	+ 7,995.7  los - 17,779.2  los + 8 775 5 lbs = 18 386 0 lbs	s = 9.09  tons		
Average H085 emissions for $1999/2000 = 18,0$		7.17 tons		
Average hours of operation for 1999/2000 = 192				
18,082.6 lbs / 1926.5 hrs = 9.386 lbs/hr				
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 characters	s):		
	•			
Ethol Benzene included in VOC total.				
Allowable Emissions Allowable Emissions N	<u>//A</u> 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 characte	rs):			
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 20	00 characters):		
	,			

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#### G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions N/A				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
H096	N/A			
3. Potential Emissions:		4. Synthetically		
5.544 lb/hour	5.341 tons/year	Limited? [ ]		
5. Range of Estimated Fugitive Emissions: N/.		ns/year		
6. Emission Factor: 100% Emitted		7. Emissions		
Reference:		Method Code:		
8. Calculation of Emissions (limit to 600 chara	cters):			
1999: Plant Nos. 1 & 3 combined = 6,615.0 lbs 2000: Plant Nos. 1 & 3 combined = 5,725.9 lbs Average H096 emissions for 1999/2000 = 10,6 Average hours of operation for 1999/2000 = 192 10,681.4 lbs / 1926.5 hrs = 5.544 lbs/hr	+ 4,290.2 lbs = 10,016.1 81.4 lbs = 5.341 tons			
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 charac	ters):		
Glycol ethers included in VOC total.				
Allowable Emissions Allowable Emissions N	<u>//A</u> of			
Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	ate of Allowable		
3. Requested Allowable Emissions and Units:	4. Equivalent Allowal	ole Emissions:		
	lb/hour ton	s/year		
5. Method of Compliance (limit to 60 characte	rs):			
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit t	o 200 characters):		
,				

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# G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units -

#### Emissions-Limited and Preconstruction Review Pollutants Only)

#### Potential/Fugitive Emissions N/A

1 otential 1 agitive Limissions				
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:			
H115	N/A			
3. Potential Emissions:		4. Syntheticaliy		
0.9042 lb/hour	0.7000 tons/year	Limited? [ ]		
5. Range of Estimated Fugitive Emissions: N/.		ns/year		
6. Emission Factor: 100% Emitted		7. Emissions		
Reference:		Method Code:		
	· .	2		
8. Calculation of Emissions (limit to 600 chara	cters):			
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 Com	ment (limit to 200 charac	ters):		
Methanol included in VOC total.	·	·		
Allowable Emissions Allowable Emissions N	<u>l/A</u> of			
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	ate of Allowable		
3. Requested Allowable Emissions and Units:	4. Equivalent Allowal	ole Emissions:		
	lb/hour t	ons/year		
5. Method of Compliance (limit to 60 character	rs):			
		•		
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to	o 200 characters):		
	F			

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

Potential/Fugitive Emissions N/A		
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:	
H120	N/A	
3. Potential Emissions:	4. Synthetically	
0.7266 lb/hour	0.6999 tons/year Limited? [ ]	
5. Range of Estimated Fugitive Emissions: N/		
	totons/year	
6. Emission Factor: 100% Emitted	7. Emissions Method Code:	
Reference:	Wethod Code:	
8. Calculation of Emissions (limit to 600 chara	acters):	
1999: Plant Nos. 1 & 3 combined = 407.2 lbs + 2000: Plant Nos. 1 & 3 combined = 840.4 lbs + Average H120 emissions for 1999/2000 = 1,39 Average hours of operation for 1999/2000 = 1991 1,399.7 lbs / 1926.5 hrs = 0.7266 lbs/hr	1,120.8 lbs = 1,961.2 lbs = 0.9806 tons 9.7 lbs = 0.6999 tons	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):		
Methyl ethyl ketone included in VOC total.		
Wethyr ethyr ketone included in voc total.		
Allowable Emissions Allowable Emissions N	<u>I/A</u> 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 characte	rs):	
6. Allowable Emissions Comment (Desc. of O	perating Method) (limit to 200 characters):	

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

Potential/Fugitive Emissions N/A					
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:				
H169	N/A				
3. Potential Emissions:	4. Synthetically				
17.69 lb/hour	17.04 tons/year Limited?	'[]			
5. Range of Estimated Fugitive Emissions: N/A	A to tons/year				
6. Emission Factor: 100% Emitted	7. Emission	ns			
Reference:	Method 2				
8. Calculation of Emissions (limit to 600 chara	cters):				
1999: Plant Nos. 1 & 3 combined = 19,686.4 lb 2000: Plant Nos. 1 & 3 combined = 18,362.5 lb Average H169 emissions for 1999/2000 = 34,07 Average hours of operation for 1999/2000 = 192 34,071.0 lbs / 1926.5 hrs = 17.69 lbs/hr	s + 14,616.4 lbs = 32,978.9 lbs = 16.49 71.0 lbs = 17.04 tons				
9. Pollutant Potential/Fugitive Emissions Com	agitive Emissions Comment (limit to 200 characters):				
Toluone included in VOC total.					
Allowable Emissions N	/ <u>A</u> of				
Basis for Allowable Emissions Code:	2. Future Effective Date of Allowa Emissions:	ble			
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions	:			
	lb/hour tons/year				
5. Method of Compliance (limit to 60 character	rs):				
6. Allowable Emissions Comment (Desc. of Op	perating Method) (limit to 200 character	ers):			

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

Potential/Fugitive Emissions N/A					
1. Pollutant Emitted:	2. Total Percent Efficiency of Control:				
H186	N/A				
3. Potential Emissions:	4. Synthetically				
40.48 lb/hour	38.99 tons/year Limited?				
5. Range of Estimated Fugitive Emissions: N/A		ns/year			
6. Emission Factor: 100% Emitted		7. Emissions			
Reference:		Method Code:			
8. Calculation of Emissions (limit to 600 chara	cters):				
1999: Plant Nos. 1 & 3 combined = 41,942.7 lb 2000: Plant Nos. 1 & 3 combined = 41,351.2 lb Average H186 emissions for 1999/2000 = 77,98 Average hours of operation for 1999/2000 = 192 77,981.6 lbs / 1926.5 hrs = 40.48 lbs/hr	s + 38,064.1 lbs = 79,415 81.6 lbs = 38.99 tons				
9. Pollutant Potential/Fugitive Emissions Com	ment (limit to 200 charac	ters):			
Xylones included in VOC total.					
Allowable Emissions Allowable Emissions N	<u>//A_</u> of				
1. Basis for Allowable Emissions Code:	2. Future Effective Da Emissions:	ate of Allowable			
3. Requested Allowable Emissions and Units:	4. Equivalent Allowal	ole Emissions:			
	lb/hour t	ons/year			
5. Method of Compliance (limit to 60 character	rs):	-			
6. Allowable Emissions Comment (Desc. of Op	perating Method) (limit to	o 200 characters):			

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

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>N/A</u> of \_\_\_\_\_

1.	Visible Emissions Subtype:	2. Basis for Allowable Opacity:			
	· · · · · · · · · · · · · · · · · · ·	[ ] Rule [ ] Other			
3.	Requested Allowable Opacity:				
	Normal Conditions: % Ex	cept	ional Conditions:	%	
	Maximum Period of Excess Opacity Allowe	ed:		min/hour	
4.	Method of Compliance:				
5.	Visible Emissions Comment (limit to 200 c	hara	oters).	<del></del>	
<i>).</i>	Visible Emissions Comment (mint to 200 C	nara	cicis).		
			NITOR INFORMAT		
	Only Doculated Emissions Units	Cub	icat to Continuous N	# - · · · · · · · · · · · · · · · · · ·	
	(Only Regulated Emissions Units	Sub	ject to Continuous N	Monitoring)	
Co			-		
	entinuous Monitoring System: Continuous	Mor	nitor <u>N/A</u> of		
		Mor	-		
	entinuous Monitoring System: Continuous	Mor	nitor <u>N/A</u> of		
3.	Parameter Code:  CMS Requirement:	Mor	nitor <u>N/A</u> of Pollutant(s):		
1.	Parameter Code:  CMS Requirement:  Monitor Information:	Mor	nitor <u>N/A</u> of Pollutant(s):		
3.	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	Mor	nitor <u>N/A</u> of Pollutant(s):		
<ol> <li>3.</li> <li>4.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number:	Moi 2.	nitor N/A of Pollutant(s):  ] Rule [  Serial Number:	] Other	
3.	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer:	Moi 2.	nitor <u>N/A</u> of Pollutant(s):	] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Mor 2.	Pollutant(s):  Rule  Serial Number:  Performance Specific	] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number:	Mor 2.	Pollutant(s):  Rule  Serial Number:  Performance Specific	] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Mor 2.	Pollutant(s):  Rule  Serial Number:  Performance Specific	] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Mor 2.	Pollutant(s):  Rule  Serial Number:  Performance Specific	] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Mor 2.	Pollutant(s):  Rule  Serial Number:  Performance Specific	] Other	
<ol> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	Parameter Code:  CMS Requirement:  Monitor Information: Manufacturer: Model Number: Installation Date:	Mor 2.	Pollutant(s):  Rule  Serial Number:  Performance Specific	] Other	

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

#### **Supplemental Requirements**

1.	Process Flow Diagram		
	[X] Attached, Document ID: 3H [] Not Applicable	[]	Waiver Requested
2.	Fuel Analysis or Specification		
	[ ] Attached, Document ID: [X ] Not Applicable	e [	] 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	e [	] Waiver Requested
5.	Compliance Test Report		
	[ ] Attached, Document ID:		
	Previously submitted, Date:	,	•
	[X ] Not Applicable		
	[N ] Not Applicable		
6.	Procedures for Startup and Shutdown		
	[ ] Attached, Document ID: [X] Not Applicable	e [	] Waiver Requested
7.	Operation and Maintenance Plan		
	[ ] Attached, Document ID: [X ] Not Applicable	e [	] Waiver Requested
0	C. I. LITC. C. C. L. L. D. L. A. H. L.		
8.	11		
	[ ] Attached, Document ID: [X ] Not Applicable	<b>C</b>	
9.	Other Information Required by Rule or Statute		_
	[ ] Attached, Document ID: [X ] Not Applicable	e	
10			
10	. Supplemental Requirements Comment:		
	N/A		,
	1 1/1 1		

DEP Form No. 62-210.900(1) - Form Effective: 2/11/99

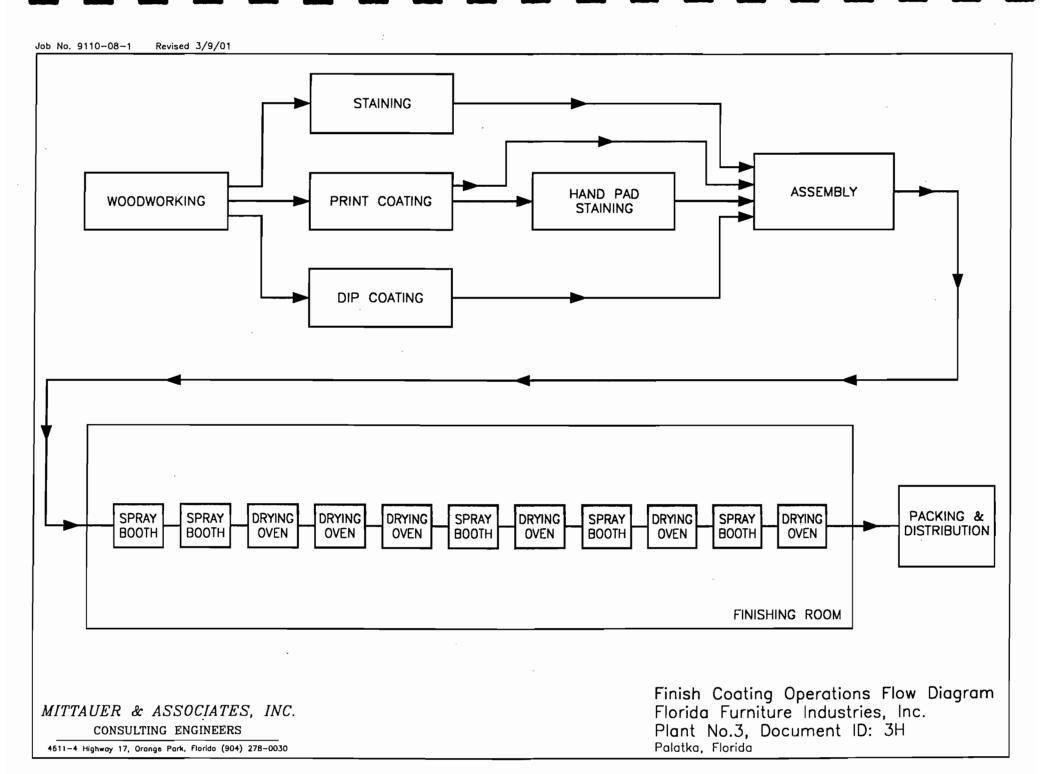
<b>Emissions Unit Information Section</b>	6.	of	6.	
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### Additional Supplemental Requirements for Title V Air Operation Permit Applications

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 3H**

**Finish Coating Operations Flow Diagram** 



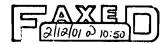


4611-4 U.S. Highway 17 Orange Park, Florida 32003 Office: (904) 278-0030

Fax: (904) 278-0840

## RECEIVED

FEB 1 3 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.

Timothy P. Norman, P.E.

Manager of Environmental Services

TPN/bb Enclosure

cc/enc: Florida Furniture

