



Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen M. Castille
Secretary

E-CORRESPONDENCE

CMILLER@MERRILAT.COM

Chadwick Miller, Plant Manager
Merillat Corporation, L.L.C.
1300 Southwest 38th Avenue
Ocala, Florida 34774

Re: **DRAFT** Title V Air Operation Permit No.: 0830137-005-AV
Cabinet Manufacturing Facility

Dear Mr. Miller:

One copy of the notice for the DRAFT Title V Air Operation Permit for the cabinet manufacturing facility located at 1300 Southwest 38th Avenue, Marion County, Florida, is enclosed. The permitting authority's "INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" are also included.

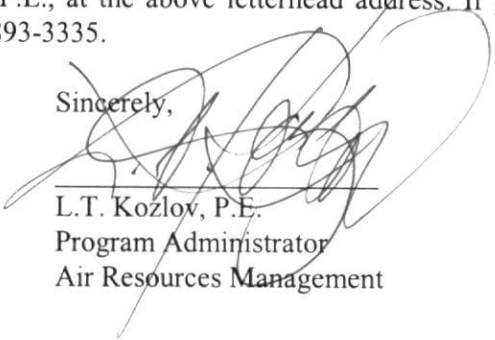
An electronic version of the DRAFT Permit has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

<http://www.dep.state.fl.us/air/eproducts/ards/default.asp>


The "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Alan Zahm P.E., at the above letterhead address. If you have any other questions, please contact Mr. Zahm at 407/893-3335.

Sincerely,



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management


LTK/azt
Enclosures

In the Matter of an
Application for Permits by:

Permittee:

Merillat Corporation
1300 S.W. 38th Avenue
Ocala, FL 34474
Chadwick Miller, Plant Manager

DRAFT Permit No.: 0830137-005-AV
Facility ID No.: 0830137
SIC Nos.: 24,2434
Project: Cabinet Manufacturing Facility

INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a DRAFT Title V Air Operation Permit (copies of DRAFT Title V Air Operation Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Merillat Corporation, applied on December 19, 2005, to the permitting authority for a Title V Air Operation Permit for the Cabinet Manufacturing Facility, located at 1300 S.W. 38TH Avenue, Ocala, Marion County, Florida.

The permitting authority 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 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V Air Operation Permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue the Title V Air Operation Permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. 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 permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803, [Telephone: 407/894-7555, Fax: 407/897-5963] 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 pursuant to Rule 62-110.106(5), F.A.C.

The permitting authority will issue the PROPOSED Title V Air Operation Permit, and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the enclosed DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice.

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 at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000, Telephone: 850/245-2242, Fax: 850/245-2303. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (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), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (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, F.A.C.

A petition that disputes the material facts on which the permitting authority'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 each 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 permitting authority'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, F.A.C.

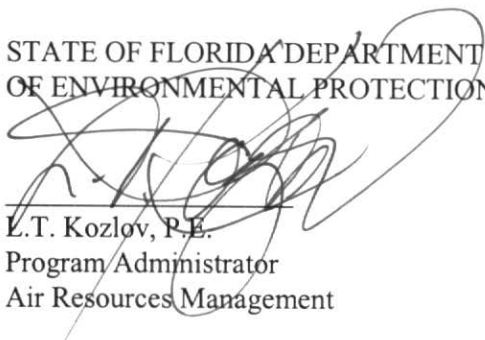
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such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

Mediation will not be available in this proceeding.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit revision. Any petition shall be based only on objections to the permit revision that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT Title V Air Operation Permit) and all copies were sent by certified mail or electronically (with Received Receipt) before the close of business on 9/6/05 to the person(s) listed:

E-CORRESPONDENCE

CMILLER@MERRILAT.COM

Chadwick Miller, Plant Manager
Merillat Corporation
1300 Southwest 38th Avenue
Ocala, Florida 34774

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT Title V Air Permit) were sent by U.S. mail or electronically (with Received Receipt) on the same date to the person(s) listed or as otherwise noted:

David Cibik (dcibik@pirnie.com)

Caroline Shine, FDEP

Al Linero (alvaro.linero@dep.state.fl.us)

Barbara Friday, BAR [Barbara.Friday@dep.state.fl.us] (for posting with Region 4, USEPA)

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, F. S.,
with the designated Department Clerk, receipt of which
is hereby acknowledged.

Dina Jones Sept. 5, 2006
Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT

Florida Department of Environmental Protection
Central District

DRAFT Title V Air Operation Permit No.: 0830137-005-AV
Cabinet Manufacturing Facility
Marion County

The Florida Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V Air Operation Permit Renewal to Merillat Corporation, L.L.C., for the Cabinet Manufacturing Facility, located at 1300 S.W. 38th Avenue, Ocala, Marion County, Florida. The applicant's name and address are: Merillat Corporation, L.L.C, 1300 S.W. 38th Avenue, Ocala, Florida, 34474.

The permitting authority will issue the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice.

Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at the Florida Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803 (telephone: 407/894-7555; fax: 407/897-5963). As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at <http://tlhora6.dep.state.fl.us/onw> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change in this DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, FL 32399-3000, Telephone: 850/245-2242, Fax: 850/245-2303. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 (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 applicable 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 (F.A.C.).

A petition that disputes the material facts on which the permitting authority'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; 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 petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the 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 state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle 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 permitting authority'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, F.A.C.

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

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at U.S. EPA, 401 M. Street SW, Washington, D.C. 20460.

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:

Permitting Authority:

Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555
Fax: 407/897-5963

The complete project file includes the DRAFT Title V Air Operation Permit, the application(s), and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Alan Zahm P.E., at the above address or call 407/893-3335 for additional information.

Merillat Corporation
Facility ID No.: 0830137
Marion County

Title V Air Operation Permit
DRAFT Permit No.: 0830137-005-AV

Permitting Authority and Compliance Authority:

Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334
Fax: 407/897-5963

Title V Air Operation Permit
Merillat Corporation
Cabinet Manufacturing Facility
DRAFT Permit No.: 0830137-005-AV

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Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen M. Castille
Secretary

Permittee:

Merillat Corporation
1300 S.W. 38th Avenue
Ocala, FL 34474

DRAFT Permit No.: 0830137-005-AV

Facility ID No.: 0830137

SIC Nos.: 24,2434

Project: Cabinet Manufacturing Facility

Attention: Chadwick Miller, Plant Manager

This permit is for the operation of the Merillat Corporation cabinet manufacturing facility located at 1300 S.W. 38th Avenue, Ocala, Marion County; Latitude: 29° 10' 30" North and Longitude: 82° 11' 15" West.

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

Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS (version dated 06/23/06)

Renewal Application Due Date: February 28, 2011
Expiration Date: August 30, 2011

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

L. T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/azt

"More Protection, Less Process"

Printed on recycled paper.

SPECIFIC CONDITIONS

Section I. Facility Information.

Subsection A. Facility Description.

Merillat Corporation produces wooden kitchen and bathroom cabinets.

Also included in this permit are miscellaneous unregulated/insignificant emission units and/or activities.

Based on the Title V permit renewal application received December 19, 2005, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
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001	Cabinet Manufacturing Finishing Lines 1, 2, 3
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002	Cabinet Manufacturing Finishing Line 4
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The permittee may operate wood furniture manufacturing facility that includes woodworking and finishing operations for the manufacturing of kitchen and bath cabinets.

Woodworking operations include wood machining, gluing, and sanding. Baghouse systems are to be used to control particulate emissions, provide at least 99% particulate removal efficiency, and exhausted to the atmosphere through a series of rooftop stacks.

Finishing operations consist of a series of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. Parts are transferred between process stations by an overhead conveyor system. Toners, stains, clear coat sealers, and clear topcoats are applied to parts as necessary to produce the desired product; however, application is performed manually, by operators in spray booths, using high-volume, low-pressure (HVLP) spray guns.

The permittee may operate off-line spray booths for part touch-up or repair, special parts or products, or special colors. A "top shop" side operation produces laminated cabinet tops. This operation includes machining operations, glue application, and a final edge trim step. Particulate emissions from the "top shop" operations are controlled by a dust collection system.

This facility is classified as Title V, a major source of hazardous air pollutants (HAPS), and is subject to the applicable requirements of Title 40, Code of Federal Regulations (CFR), Part 63, Subpart A – General Provisions, and Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations.

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

SPECIFIC CONDITIONS

Subsection C. Relevant Documents.

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

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

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

Appendix H-1, Permit History / ID Number Changes

These documents are on file with permitting authority:

Initial Title V Permit Application received February 28, 2001

Initial Title V Permit issued September 10, 2001

Construction Permit (non PSD) 4th Finishing Line issued July 5, 2005

SPECIFIC CONDITIONS

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297, F.A.C.
[Rule 62-296.320(4)(b)1., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a) The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018
 - b) The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

To comply, procedures to minimize pollutant emissions shall include the following:

- a) tightly cover or close all VOC containers when they are not in use,

SPECIFIC CONDITIONS

- b) tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use,
- c) maintain all piping, valves, fittings, etc. in good operating condition,
- d) prevent excessive air turbulence across exposed VOC's,
- e) immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.
[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a) Maintenance of paved areas as needed;
- b) Regular mowing of grass and care of vegetation;
- c) Limited access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c), F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

9. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the air compliance section of this office and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the following office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/893-3334; Fax: 407/897-5963

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxic Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

SPECIFIC CONDITIONS

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62.213.420(4), F.A.C.]

13. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", including the Emissions Report, shall be completed for each calendar year, on or before March 1 of the following year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.]

14. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions. [Rules 62-213.205 and 62-213.900(1), F.A.C.]

15. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

16. Annual Emissions Fee. A completed DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be submitted by the responsible official with the annual emissions fee.

[Rule 62-213.205(1)(k), F.A.C.]

17. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).

[Rule 62-4.090(1), F.A.C.]

SPECIFIC CONDITIONS

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

<u>E.U. ID No.</u>	<u>Brief Description</u>
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001	Cabinet Manufacturing Finishing Lines 1, 2, 3
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002	Cabinet Manufacturing Finishing Lines 4
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The permittee may operate a wood furniture manufacturing facility that will include woodworking and finishing operations for the manufacturing of kitchen and bath cabinets.

Woodworking operations include wood machining, gluing, and sanding. Baghouse systems shall be used to control particulate emissions, provide at least 99% particulate removal efficiency, and exhausted to the atmosphere through a series of rooftop stacks.

Finishing operations consist of a series of application spray booths, flash areas, brush and wipe sanding stations, and curing ovens. Parts shall be transferred between process stations by an overhead conveyor system. Toners, stains, clear coat sealers, and clear topcoats may be applied to parts as necessary to produce the desired product; however, application shall be performed manually by operators in spray booths, using high-volume, low-pressure (HVLP) spray guns.

Additionally, the permittee may operate off-line spray booths for part touch-up or repair, special parts or products, or special colors. Also, a "top shop" side operation may be constructed to produce laminated cabinet tops. This operation shall include machining operations, glue application, and a final edge trim step. Particulate emissions from the "top shop" operations are controlled by a dust collection system.

This facility is classified as Title V, a major source of hazardous air pollutants (HAPS), and is subject to the applicable requirements of Title 40, Code of Federal Regulations (CFR), Part 63, Subpart A – General Provisions, and Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations.

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

Essential Potential to Emit (PTE) Parameters

A1. Hours of Operation. The emissions unit is permitted to operate continuously.
[Rules 62-4.160(2) and 62-210.200, (PTE), F.A.C., and Construction Permit 0830137-003-AC]

Emission Limitations and Standards

A2. Visible emissions from the paint booths shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1., F.A.C.]

SPECIFIC CONDITIONS

A3. Volatile Organic Compound: The total VOC and HAP emission rate shall not exceed 249 tons per consecutive twelve months for finishing lines 1, 2 and 3 and 166 tons per consecutive twelve months for finishing line 4.

[Rule 62-210.200 – (PTE), F.A.C., Construction Permit 0830137-003-AC]

Test Methods and Procedures

A4. Each baghouse emission point must be compliance tested for visible emissions in accordance with DEP Method 9 at least 180 days prior to the permit expiration date. The test shall be conducted for thirty minutes.

[Rules 62-297.401(9)(c), 62-297.310(7)(a)4.a., and 62-297.310(4)(a)2., F.A.C.]

A5. The provisions of EPA Method 9 (40CFR), Appendix A) are adopted by reference with the following exceptions:

a. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen-second intervals during the required period of observation.

b. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g. 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g. 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

1) For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

2) For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

A6. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the air compliance section of this office. The notification must include the following information: the date, time and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.

[Rule 62-297.310(7)(a)9, F.A.C.]

SPECIFIC CONDITIONS

A7. Testing of emissions shall be conducted with the emissions unit operation 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 minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load 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), F.A.C.]

A8. Reports of the required test report shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.

[Rules 62-297.310(8), F.A.C.]

Recordkeeping

A9. In order to demonstrate compliance with specific condition A3, the permittee shall maintain a monthly log at the facility for a period of at least five years from the date the data is recorded. The log, at a minimum, shall contain the month, the total VOC emissions for the month and the total VOC emissions for the last 12 consecutive months.

A10. Compliance with the VOC emission limit shall be determined through the use of a mass balance of the organic chemicals purchased and reclaimed. The difference will be assumed to be emissions to the ambient air.

[Construction Permit 0830137-003-AC.]

A11. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (the amount used minus the amount collected for disposal or recycle). Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24 and 24A, etc.) shall be kept for each chemical and associated product, which includes sufficient information to determine usage rates and emissions. These records shall be kept at the facility for at least five years and made available to the Department upon request.

Volatile matter content shall be calculated using a percent solids basis (less water and exempt solvents) for adhesives, coatings, and inks, using EPA Reference Method 24 and 24A, or the Department shall accept a certification by the coating manufacturer of the composition of the coating if it is supported by standard formulation records for catalog paints or actual batch formulation records. The manufacturer's certification shall be consistent with EPA's document number 450/3-84-019, titled, "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings".

[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

SPECIFIC CONDITIONS

A12. This emission unit is subject to the following requirements from Title 40 of the Code of Federal Regulations Part 60 (see attached Appendix B):

National Emission Standards for Wood Furniture Manufacturing Operations

40 CFR 63.800	<u>Applicability</u>	Appendix B, page 1
40 CFR 60.802	<u>Emission Limits</u>	Appendix B, page 1
40 CFR 60.803	<u>Work Practice Standards</u>	Appendix B, page 1
40 CFR 60.804	<u>Compliance Procedures and Monitoring Requirements</u>	Appendix B, page 5
40 CFR 60.805	<u>Performance Test Methods</u>	Appendix B, page 6
40 CFR 60.806	<u>Record keeping Requirements</u>	Appendix B, page 7
40 CFR 60.807	<u>Reporting Requirements</u>	Appendix B, page 8

Appendix H-1, Permit History/ID Number Changes

Merillat Corporation
Cabinet Manufacturing Facility

DRAFT Permit No.: 0830137-005-AV
Facility ID No.: 0830137

Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit Number</u>	<u>Issue Date</u>	<u>Expiration Date</u>
-001	Cabinet Manufacturing	0830137-001-AC	August 6, 1999	July 31, 2004
-001	Cabinet Manufacturing	0830137-002-AV	September 10, 2001	August 30, 2006
A11	Cabinet Manufacturing	0830137-003-AC	July 1, 2005	December 1, 2006
A11	Cabinet Manufacturing	0830137-004-AV	Withdrawn by Tallahassee office	October 14, 2004
A11	Cabinet Manufacturing	0830137-005-AV	Pending	August 30, 2011

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Merillat Corporation, L.L.C.

Cabinet Manufacturing Facility

DRAFT Permit No.: 0830137-005-AV

Facility I.D. No.: 0830137

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62-210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Woodworking Operations