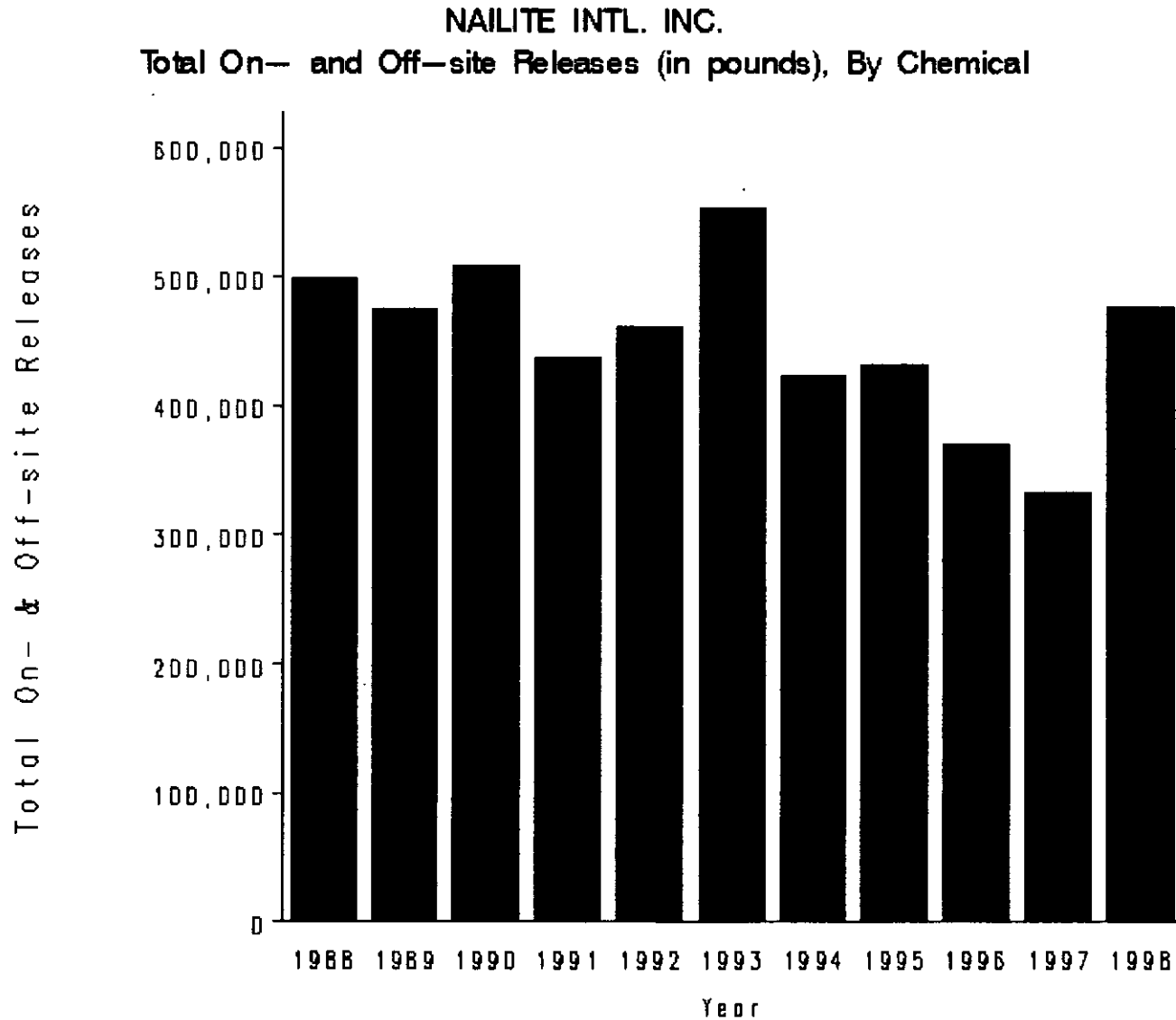




EPA Office of Environmental Information

Release Trend Graph



1, 2, 4-TRIMETHYLB ACETONE TOLUENE

TRIF ID 33169NLTNT1251N

Release Trend Graph
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August 3, 2000
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This request took 0.38 seconds of real time (v1.0.1 build 1039).



EPA Office of Environmental Information

Facility Report

[See Note](#) [Return to selection](#)

TRI On-site and Off-site Reported Releases of All Chemicals (in pounds), Dade County, State of Florida, 1998, All Industries

Facility, and Chemical	TRIF ID	Form Rs	Form As	Total Air Emissions	Surface Water Discharges	Under-ground Injection	Releases to Land	Total On-site Releases	Total Off-site Releases	Total On- & Off-site Releases
<input type="checkbox"/> <input type="checkbox"/>				<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
A-1 COMPONENTS CORP., 625 W. 18TH ST., HIALEAH	33010WTSCN1800W	1	0	170	0	0	0	170	0	170
AMMONIA		1	0	170	0	0	0	170	0	170
AAR LANDING GEAR SERVICES, 9371 N.W. 100 ST., MIAMI	33178RLNDN9371N	1	0	30	0	0	0	30	0	30
TETRACHLOROETHYLENE		1	0	30	0	0	0	30	0	30
ALJOMA LUMBER INC., 10300 N.W. 121 WAY, MEDLEY	33178LJMLM10300	3	0	0	15	0	0	15	3,393	3,408
ARSENIC COMPOUNDS		1	0	0	5	0	0	5	1,315	1,320
CHROMIUM COMPOUNDS		1	0	0	5	0	0	5	1,322	1,327
COPPER COMPOUNDS		1	0	0	5	0	0	5	756	761
ALLIED UNIVERSAL CORP., 8350 N.W. 93RD ST., MIAMI	33166LLDNV8350N	1	1	0	0	0	0	0	0	0
AMMONIA		0	1							
CHLORINE		1	0	0	0	0	0	0	0	0
ALTHIN MEDICAL INC., 14620 N.W. 60TH AVE., MIAMI LAKES	33014CDMDC14600	1	0	10	0	0	0	10	0	10
DIISOCYANATES		1	0	10	0	0	0	10	0	10
ANGLER BOAT CORP., 4450										

N.W. 128TH ST., OPA LOCKA										
STYRENE		1	0	47,743	0	0	0	47,743	0	47,743
APACHE PRODS. CO., 1020 S.W. 69TH AVE., MIAMI	33144DYPLS1020S	3	0	52,736	0	0	0	52,736	1,397	54,133
1,1-DICHLORO-1-FLUOROETHANE		1	0	44,366	0	0	0	44,366	0	44,366
CHLORODIFLUOROMETHANE		1	0	8,270	0	0	0	8,270	0	8,270
DIISOCYANATES		1	0	100	0	0	0	100	1,397	1,497
ASHLAND DISTRIBUTION CO., 200 N.E. 181ST ST., MIAMI	33162SHLND200NE	8	5	7,038	0	0	0	7,038	0	7,038
1,2,4-TRIMETHYLBENZENE		1	0	64	0	0	0	64	0	64
CERTAIN GLYCOL ETHERS		1	0	194	0	0	0	194	0	194
CUMENE		0	1
ETHYLENE GLYCOL		0	1
METHANOL		1	0	640	0	0	0	640	0	640
METHYL ETHYL KETONE		1	0	690	0	0	0	690	0	690
METHYL ISOBUTYL KETONE		0	1
N-HEXANE		1	0	540	0	0	0	540	0	540
SEC-BUTYL ALCOHOL		1	0	310	0	0	0	310	0	310
TETRACHLOROETHYLENE		0	1
TOLUENE		1	0	3,470	0	0	0	3,470	0	3,470
TRICHLOROETHYLENE		0	1
XYLENE (MIXED ISOMERS)		1	0	1,130	0	0	0	1,130	0	1,130
B & B TRITECH INC., 875 W. 20TH ST., HIALEAH	33010BBCHM87520	1	2	9,000	0	0	0	9,000	0	9,000
CERTAIN GLYCOL ETHERS		0	1
DICHLOROMETHANE		1	0	9,000	0	0	0	9,000	0	9,000
PHENOL		0	1
BENADA ALUMINUM OF FLORIDA INC., 8800 N.W. 79TH AVE., MEDLEY	33166BNDLM8800N	5	0	0	0	0	0	0	2	2
CHROMIUM COMPOUNDS		1	0	0	0	0	0	0	2	2
HYDROGEN FLUORIDE		1	0	0	0	0	0	0	0	0
PHOSPHORIC ACID		1	0	0	0	0	0	0	0	0
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS")		1	0	0	0	0	0	0	0	0

ONLY)											
XYLENE (MIXED ISOMERS)		1	0	0	0	0	0	0	0	0	0
BERTRAM YACHT INC., 3663 N.W. 21ST ST., MIAMI	33142BRTRM3663N	2	0	33,815	0	0	0	33,815	0	33,815	
STYRENE		1	0	21,540	0	0	0	21,540	0	21,540	
TOLUENE		1	0	12,275	0	0	0	12,275	0	12,275	
BEVERAGE CANNERS INTL. CORP., 3550 N.W. 110 ST., MIAMI	33167BVRGC3550N	1	0	0	0	0	0	0	0	0	
PHOSPHORIC ACID		1	0	0	0	0	0	0	0	0	
BF GOODRICH AEROSPACE LANDING GEAR SERVICES, 3201 N.W. 167TH ST., MIAMI	33056BFGDR3201N	2	0	10,660	0	0	0	10,660	3,800	14,460	
CHROMIUM COMPOUNDS		1	0	500	0	0	0	500	3,800	4,300	
TRICHLOROETHYLENE		1	0	10,160	0	0	0	10,160	0	10,160	
BF GOODRICH AEROSPACE, LANDING GEAR SERVICES DIV., 6445 N.W. 25TH ST., MIAMI	33122CLVLN6445N	2	0	27,700	0	0	0	27,700	18,100	45,800	
CHROMIUM COMPOUNDS		1	0	500	0	0	0	500	18,100	18,600	
TRICHLOROETHYLENE		1	0	27,200	0	0	0	27,200	0	27,200	
BRAIN POWER INC., 4470 S.W. 74TH AVE., MIAMI	33155BRNPW4470S	1	0	3	0	0	0	3	0	3	
CERTAIN GLYCOL ETHERS		1	0	3	0	0	0	3	0	3	
CONSOLIDATED OIL CO., 11550 N.W. 36TH AVE., MIAMI	33167CNSLD11550	6	0	1,765	0	0	0	1,765	0	1,765	
BENZENE		1	0	500	0	0	0	500	0	500	
ETHYLBENZENE		1	0	10	0	0	0	10	0	10	
N-HEXANE		1	0	500	0	0	0	500	0	500	
TOLUENE		1	0	500	0	0	0	500	0	500	
XYLENE (MIXED ISOMERS)		1	0	255	0	0	0	255	0	255	
ZINC COMPOUNDS		1	0	0	0	0	0	0	0	0	
CONTENDER BOATS INC., 1820 S. E. 38TH AVE., HOMESTEAD	33035CNTND1820S	1	1	48,931	0	0	0	48,931	0	48,931	
DIISOCYANATES		0	1								
STYRENE		1	0	48,931	0	0	0	48,931	0	48,931	

60TH AVE., MIAMI LAKES	33014CRDSC14201	1	0	9,083	0	0	0	9,083	0	9,083
TRICHLOROETHYLENE		1	0	9,083	0	0	0	9,083	0	9,083
DELTA LABS. INC., 640 W. 18TH ST., HIALEAH	33010DLTLB640WE	5	0	1,885	0	0	0	1,885	0	1,885
CERTAIN GLYCOL ETHERS		1	0	6	0	0	0	6	0	6
METHANOL		1	0	884	0	0	0	884	0	884
METHYL ETHYL KETONE		1	0	588	0	0	0	588	0	588
TOLUENE		1	0	328	0	0	0	328	0	328
XYLENE (MIXED ISOMERS)		1	0	79	0	0	0	79	0	79
DIMENSIONAL PLASTICS CORP., 1065 E. 26TH ST., HIALEAH	33013DMNSN1065E	2	0	2,350	0	0	0	2,350	0	2,350
METHYL METHACRYLATE		1	0	830	0	0	0	830	0	830
STYRENE		1	0	1,520	0	0	0	1,520	0	1,520
DM INDS., 2320 N.W. 147TH ST., OPA LOCKA	33054DMNDS2320N	2	0	38,180	0	0	0	38,180	0	38,180
DIISOCYANATES		1	0	80	0	0	0	80	0	80
STYRENE		1	0	38,100	0	0	0	38,100	0	38,100
ENGELHARD HEXCORE, 3550 N.W. 49 ST., MIAMI	33142CBGGY3550N	1	0	68,620	0	0	0	68,620	0	68,620
PHENOL		1	0	68,620	0	0	0	68,620	0	68,620
FLEXIBLE FOAM PRODS. INC., 3225 N.W. 107TH ST., MIAMI	33167FLXBL3225N	2	0	696,857	0	0	0	696,857	0	696,857
DICHLOROMETHANE		1	0	696,357	0	0	0	696,357	0	696,357
TOLUENE DIISOCYANATE (MIXED ISOMERS)		1	0	500	0	0	0	500	0	500
FLORIDA PLATING & FINISHING CORP., 3595 N.W. 125TH ST., MIAMI	33167FLRDP3595N	1	0	0	0	0	0	0	0	0
NICKEL		1	0	0	0	0	0	0	0	0
GE ENGINE SERVICES, MIAMI INC., 4590 N.W. 36TH ST., MIAMI	33122GRNWC4590N	3	0	1,010	0	0	15	1,025	4,040	5,065
CHROMIUM		1	0	500	0	0	5	505	1,510	2,015
COBALT		1	0	10	0	0	5	15	1,020	1,035
NICKEL		1	0	500	0	0	5	505	1,510	2,015

GENERAL CINEMA BEVERAGES, OF MIAMI, 7777 N.W. 41ST ST., MIAMI	33166GNRLC7777N	0	1
PHOSPHORIC ACID		0	1
HARD CORE TECHS. INC., MIAMI CASTINGS DIV., 4701 N.W. 77TH AVE., MIAMI	33166CHRML4701N	2	0	0	0	0	11,534	11,534	11,534	23,068	
CHROMIUM		1	0	0	0	0	5,190	5,190	5,190	10,380	
NICKEL		1	0	0	0	0	6,344	6,344	6,344	12,688	
HCI INDL. CHEMICAL & SUPPLY CO., 8700 N.W. 36TH AVE., MIAMI	33147HCNDL8700N	0	5
CERTAIN GLYCOL ETHERS		0	1
ETHYLENE GLYCOL		0	1
METHYL ETHYL KETONE		0	1
TOLUENE		0	1
XYLENE (MIXED ISOMERS)		0	1
MAGNUM MARINE CORP., PLANT 2, 1846 N.E. 142ND ST., NORTH MIAMI BEACH	33181MGNMM14100	1	0	5,080	0	0	0	5,080	0	5,080	
STYRENE		1	0	5,080	0	0	0	5,080	0	5,080	
MAKO MARINE INTL. INC., 4355 N.W. 128TH ST., OPA LOCKA	33054MKMRN4355N	1	1	99,358	0	0	0	99,358	0	99,358	
DIISOCYANATES		0	1
STYRENE		1	0	99,358	0	0	0	99,358	0	99,358	
MCARTHUR DAIRY INC., 6851 N.E. 2ND AVE., MIAMI	33138MCRTH6851N	1	0	0	0	0	0	0	0	0	
PHOSPHORIC ACID		1	0	0	0	0	0	0	0	0	
MIAMI BATTERY MFG. CO., 11100 N.W. S. RIVER DR., MIAMI	33178MMBTT11100	2	0	0	0	0	0	0	0	0	
LEAD		1	0	0	0	0	0	0	0	0	
LEAD COMPOUNDS		1	0	0	0	0	0	0	0	0	
MIAMI BRANCH - FAST PARTS, 2851 N.W. 107TH AVE., MIAMI	33172MMBRN2851N	1	0	0	0	0	0	0	0	0	
CHLORODIFLUOROMETHANE		1	0	0	0	0	0	0	0	0	

MODINE AFTERMARKET, HOLDINGS INC., 7391 N.W. 78TH ST., MEDLEY	33166MDNST7391N	1	0	2	0	0	0	2	0	2
COPPER		1	0	2	0	0	0	2	0	2
NAILITE INTL. INC., 1251 N.W. 165TH ST., MIAMI	33169NLTNT1251N	2	0	476,300	0	0	0	476,300	0	476,300
1,2,4-TRIMETHYLBENZENE		1	0	14,200	0	0	0	14,200	0	14,200
TOLUENE		1	0	462,100	0	0	0	462,100	0	462,100
NOVEN PHARMACEUTICALS INC., EAST-WEST FACILITY, 11960 S.W. 144TH ST., MIAMI	33186NVNPH11960	1	0	1,000	0	0	0	1,000	0	1,000
TOLUENE		1	0	1,000	0	0	0	1,000	0	1,000
NOVURANIA OF AMERICA INC., 4775 N.W. 132ND ST., MIAMI	33054NVRNF4775N	1	0	9,270	0	0	0	9,270	0	9,270
STYRENE		1	0	9,270	0	0	0	9,270	0	9,270
PARKSON CORP., 9770 N.W. 91ST CT., MEDLEY	33178PRKSN9770N	1	0	9,045	0	0	0	9,045	7,000	16,045
STYRENE		1	0	9,045	0	0	0	9,045	7,000	16,045
PHASE II FURNITURE & STORE, FIXTURES CORP., 9400 N.W. 104TH ST., MEDLEY	33178PHSFR9400N	2	0	23,818	0	0	0	23,818	0	23,818
N-HEXANE		1	0	10,918	0	0	0	10,918	0	10,918
TOLUENE		1	0	12,900	0	0	0	12,900	0	12,900
PURITY PRODS. INC., 1800 N.W. 70TH AVE., MIAMI	33126PRTYC1800N	1	0	250	0	0	0	250	0	250
CERTAIN GLYCOL ETHERS		1	0	250	0	0	0	250	0	250
REPUBLIC METALS CORP., 12900 N.W. 38TH AVE., OPA LOCKA	33054RPBLC12900	1	2	0	0	0	0	0	0	0
COPPER COMPOUNDS		0	1
NITRIC ACID		1	0	0	0	0	0	0	0	0
SILVER		0	1
ROYAL STORE FIXTURES CORP., 3595 N. W. 125TH ST., MIAMI	33167RYLST3595N	1	0	14,302	0	0	0	14,302	750	15,052
TOLUENE		1	0	14,302	0	0	0	14,302	750	15,052
SCHERING CORP., 13900 N.W.	33014SCHRN13900	1	0	56	0	0	0	56	0	56

NITROGLYCERIN		1	0	56	0	0	0	56	0	56	
SENTRY IND. INC., 5687 N.W. 36TH AVE., MIAMI	33142SNTRY5687N	1	0	10	0	0	0	10	0	10	
CHLORINE		1	0	10	0	0	0	10	0	10	
TOWER PAINT MFG., 620 W. 27TH ST., HIALEAH	33010TWRPN620W2	1	0	0	0	0	0	0	0	0	
ETHYLENE GLYCOL		1	0	0	0	0	0	0	0	0	
TURKEY POINT POWER PLANT, 9700 S.W. 344 ST., HOMESTEAD	33035TRKYP9700S	4	0	278,001	0	0	120	278,121	0	278,121	
HYDRAZINE		1	0	0	0	0	120	120	0	120	
HYDROCHLORIC ACID (1995 AND AFTER "ACID AEROSOLS" ONLY)		1	0	48,000	0	0	0	48,000	0	48,000	
POLYCYCLIC AROMATIC COMPOUNDS		1	0	1	0	0	0	1	0	1	
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)		1	0	230,000	0	0	0	230,000	0	230,000	
U.S. HOLDINGS CORP., 8351 N.W. 93RD ST., MEDLEY	33166SHLDN8351N	3	0	2,000	0	0	0	2,000	126,200	128,200	
LEAD COMPOUNDS		1	0	500	0	0	0	500	25,500	26,000	
MANGANESE COMPOUNDS		1	0	500	0	0	0	500	14,700	15,200	
ZINC COMPOUNDS		1	0	1,000	0	0	0	1,000	86,000	87,000	
VELDA FARMS DAIRY, 501 N.E. 181ST. ST., MIAMI	33162VLDFR501NE	1	0	0	0	0	0	0	0	0	
PHOSPHORIC ACID		1	0	0	0	0	0	0	0	0	
Total		105	87	18	1,976,078	15	0	11,669	1,987,762	176,216	2,163,978

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Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



June 21, 2000

0037523A/06

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL, 32399-2400

RECEIVED

JUN 22 2000

BUREAU OF AIR REGULATION

Attention: A. A. Linero, P.E.

RE: NAILITE INTERNATIONAL, INC. – NEW PANEL FINISHING SPRAY LINE
DEP FILE NO. 0250407-003-AC (PSD-FL-289)

Dear Mr. Linero:

Based on DERM's letter of June 16 concerning minimum capture efficiency, Golder Associates Inc. (Golder), on behalf of Nailite International, has prepared the following responses:

1. Nailite agrees to comply with the requested minimum 95 percent capture efficiency for the new spray line.
2. Nailite has no objection demonstrating the requested capture efficiency of the new spray booths. However, since designing an enclosure to demonstrate compliance with the capture efficiency can be an expensive proposition, Golder recommends initially using available manufacturing information to the fullest extent possible. If such information is not to the satisfaction of DEP, then an enclosure can be built to show compliance. Either way, Nailite will demonstrate compliance with the minimum capture efficiency.
3. The existing spray line will be connected to the regenerative thermal oxidation (RTO) prior to the start of any spraying at the new facility.

The existing spray paint line cannot comply with the minimum capture efficiency of 95 percent as requested by DERM. The existing booths are not comparable with the proposed booths in that they have one open side that cannot be enclosed. It should be noted that the existing spray line currently has a valid air operating permit without the requested additional condition. Additionally, it is Nailite's intention to replace the old spray line with a new one, similar to the one proposed, in the near future.

Please call if you have any questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.

Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/jkw

cc: David Steedman, Nailite
David Buff, Golder

cc: G. Reynolds
EPA
NPS
SED
DERM



June 16, 2000

Department of Environmental Protection
Air Resources Management
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Attention: John Reynolds

ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

RECEIVED
JUN 22 2000
BUREAU OF AIR REGULATION

RE: Nailite International, Inc.- New Panel Finishing Spray Line

Dear Mr. Reynolds:

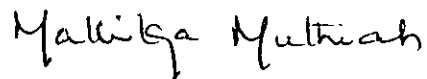
Based on our telephone conference with Mr. Benny Susi of Nailite on June 7th, and his subsequent letter dated June 13, 2000, DERM would like the following comments to be included as part of Nailite's PSD permit application review:

1. As mentioned in my letter dated May 25, 2000, a 10% fugitive emissions will result in an overall efficiency of only 86%. As you know, Mr. Susi has indicated in his letter that the actual fugitive emissions are close to 2 percent rather than the 10 percent as estimated in the application. Since a higher capture efficiency is claimed, it is prudent that DEP require them to have a minimum 95% capture efficiency. The emissions from these operations are only HAPs. Therefore, it is essential to conform to this requirement due to the potential for public sanitary nuisance.
2. As Mr. Susi stated in his letter, the equipment is new and has not been tested. Therefore, it is absolutely necessary for the facility to conduct an initial performance test to determine the capture efficiency of the new control equipment. DERM recommends DEP to make the performance test as a requirement in the construction permit to establish the minimum 95% capture efficiency.
3. Nailite must commit to consolidate and connect the existing operation (AV 0250407) to the Thermal Oxidizer by a specific date acceptable to the regulatory agency. The consolidated operation must meet the required minimum capture efficiency of 95%.

For your information, our staff Marcelo Barros and Frank Echanique conducted an inspection of the existing operation and the on-going new construction on June 14, 2000.

I will be out of the office during the next week. If you have any questions regarding this memo, please contact Marcelo Barros or Frank Echanique at (305) 372-6925.

Sincerely,

A handwritten signature in cursive script that reads "Mallika Muthiah".

Mallika Muthiah, P.E., Chief,
Air Facilities Section
Miami-Dade County D.E.R.M.

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



June 13, 2000

JUN 16 2000

0037523A/04

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL, 32399-2400

BUREAU OF AIR REGULATION

Attention: A. A. Linero, P.E.

RE: NAILITE INTERNATIONAL, INC. – NEW PANEL FINISHING SPRAY LINE
DEP FILE NO. 0250407-003-AC(PSD-FL-289)

Dear Mr. Linero:

To follow-up on our telephone conversation with Ms. Muthiah of DERM concerning fugitive emissions associated with the new spray line. Golder Associates Inc. (Golder), on behalf of Nailite International, has prepared the following response:

As discussed, Nailite through its coating supplier, Strathmore Products Inc. conducted three evaporation tests to determine how much solvent would evaporate from the sprayed film over 90 seconds. The evaporation tests along with travel time of products through the spray line resulted in estimated fugitive emissions from the spray line. A copy of Strathmore test results, a schematic of the spray line, and fugitive emission calculations are attached to this letter.

The attached schematic presents fugitive emission calculations based on the evaporation test conducted by Strathmore. The emission calculations are based on 1-mil wet film applied on each panel at each spray booth. The estimated solvent lost outside the booth is estimated to be 2 percent.

Due to the nature of this new technology, the applicant had included a very conservative estimate of potential fugitive emissions. As demonstrated in this response, the actual fugitive emissions are closer to 2 percent rather than the 10 percent as estimated in the application. The applicant requests that no limit on fugitive emissions be included in the air construction permit due to the fact that the equipment is new and has not been tested.

Please call if you have any questions concerning this information.

Sincerely,
GOLDER ASSOCIATES INC.

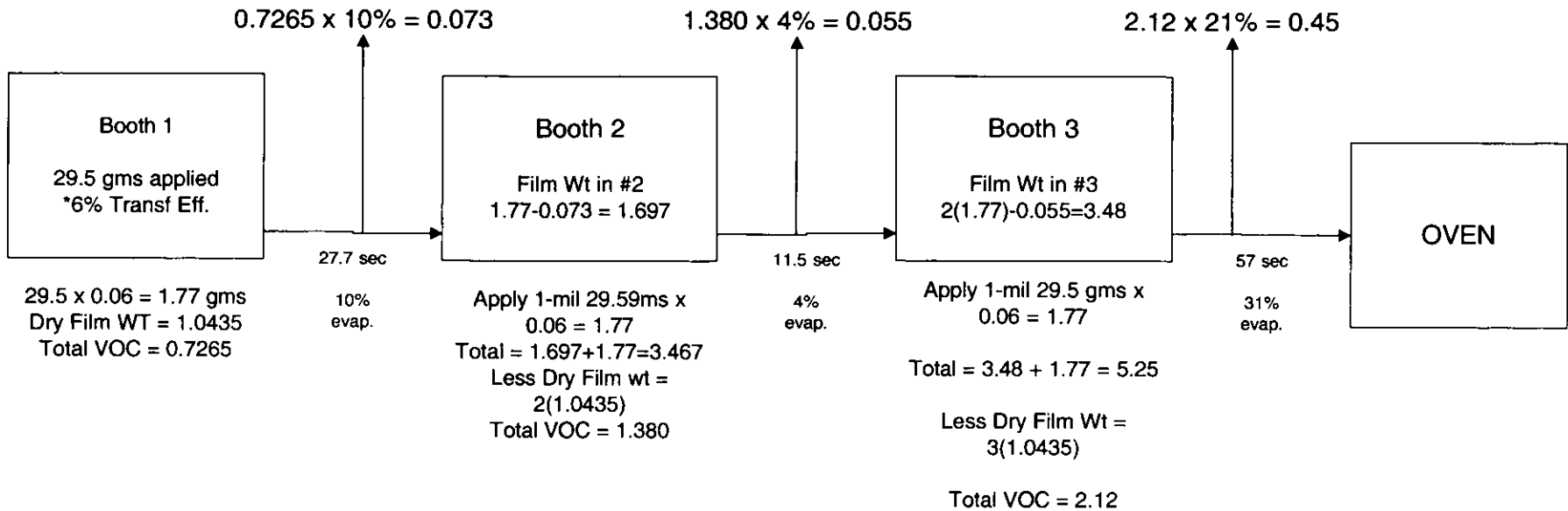
Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/jkw

cc: David Steedman, Nailite
David Buff, Golder

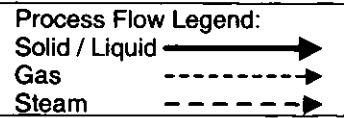
cc: J. Reynolds
SED
WPS
EPA
DERM

FUGITIVE EMISSIONS:



TOTAL FUGITIVES = 0.073 + 0.055 + 0.45 = 0.5785 GMS
 PERCENT FUGITIVES = 0.578 / 29.5 X 100 = 1.95%

1. Transfer efficiency based on laboratory results.
2. Test results Evaporation rates are based on elapsed time as reported by the Strathmore Laboratory.



Process Flow Diagram for Fugitive Emissions
 Nailite International, Inc.

Latest Revision Date: 6/12/00



Strathmore Products, Inc.

FORMULATORS AND MANUFACTURERS OF CHEMICAL COATINGS - PAINTS - ENAMELS - LACQUERS

RECEIVED MAY 01 2000

April 26, 2000

Dave Steedman
Nalite International
1251 Northwest 165th Street
Miami, FL 33169

Dear Dave:

Per your request, three evaporation tests were run at Strathmore to determine how much solvent would evaporate from a sprayed film in 90 seconds.

I randomly chose the light buff coating I35-0093, C-690. After thorough mixing, seven ounces of I35-0093 was reduced with three ounces of solvent or solvent blend and added to the cup of a cup gun. The cup was then attached to the suction feed gun and the assembly was weighed on a digital pound scale. A 3 x 5 inch cold rolled steel panel was then sprayed at 40 pounds atomization. The panel was then rushed to a digital analytical balance where the timed weights were taken. The doors of the analytical balance were left open to allow air flow over the panel. The steel panel was reweighed after an overnight dry on the digital analytical balance to determine its final dry weight.

Tests #1 and #2 were sprayed from the same ten-ounce sample.

The following results were obtained:

Strathmore Products, Inc.

1-mil

nailite evaporation page 2

Test 1

- Reduce paint, 70 parts paint to 30 parts acetone
- Weigh cup gun prior to spraying panel and after spraying
- Spray a 3 x 5 inch steel panel to a 1 mil dry film thickness
- Measure panel weight every 10 seconds
- Report % solvent evaporated after 90 seconds

Temperature 77°F
 Relative Humidity 39 %
 Cup gun prior to spraying 4.521 lbs
 Cup gun after spraying 4.456 lbs
 .065 lbs = 29.5 gms

Uncoated Panel 73.5807 gms
 Wet Panel 75.2760 gms Wet Film Weight = 1.6953 gms
 Dry Panel 74.6242 gms Dry Film Weight = 1.0435 gms

Time (seconds)	Panel Weight (grams)	% Solvent Evaporated
10	75.2543	3.3
20	75.2230	8.1
30	75.2000	11.7
40	75.1653	17.0
50	75.1330	21.9
60	75.1127	25.0
70	75.0854	29.2
80	75.0652	32.4
90	75.0312	37.6

Strathmore Products, Inc.

nailite evaporation page 3

Test 2

- Reduce paint, 70 parts paint to 30 parts acetone
- Weigh cup gun prior to spraying panel and after spraying
- Spray a 3 x 5 inch steel panel to 2 mils dry film thickness
- Measure panel weight every 10 seconds
- Report % solvent evaporated after 90 seconds

Temperature 77°F
 Relative Humidity 39 %
 Cup gun prior to spraying 4.456 lbs
 Cup gun after spraying 4.367 lbs
 .089 lbs = 40.4 gms

Uncoated Panel 73.6624 gms
 Wet Panel 76.4012 gms Wet Film Weight = 2.7388 gms
 Dry Panel 75.2664 gms Dry Film Weight = 1.6040 gms

Time (seconds)	Panel Weight (grams)	% Solvent
10	76.3780	2.0
20	76.3484	4.6
30	76.2991	9.0
40	76.2554	12.8
50	76.2170	16.2
60	76.1884	18.8
70	76.1645	20.9
80	76.1403	23.0
90	76.1113	25.6

Strathmore Products, Inc.

nailite evaporation page 4

Test 3

- Reduce paint, 70 parts paint to 15 parts toluene to 15 parts acetone
- Weigh cup gun prior to spraying panel and after spraying
- Spray a 3 x 5 inch steel panel to a 1 mil dry film thickness
- Measure panel weight every 10 seconds
- Report % solvent evaporated after 90 seconds

Temperature 76°F
 Relative Humidity 37 %
 Cup gun prior to spraying 4.497 lbs
 Cup gun after spraying 4.423 lbs
 .074 lbs = 33.6 gms

Uncoated Panel 74.1115 gms
 Wet Panel 76.6710 gms Wet Film Weight = 2.5595 gms
 Dry Panel 75.5042 gms Dry Film Weight = 1.3927 gms

Time (seconds)	Panel Weight (grams)	% Solvent
10	76.6300	3.5
20	76.5700	8.6
30	76.5350	11.6
40	76.4970	14.9
50	76.4710	17.1
60	76.4260	21.0
70	76.3990	23.3
80	76.3650	26.2
90	76.3400	28.4

If you have any questions, please feel free to call.

Sincerely,

David Harwood (d2)

David Harwood
 Senior Chemist
 DH/ll

lsb/harwood:nailite 4-26-00



Florida
Department of
Environmental Protection

Jeb Bush
Governor

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

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 6-19

TO: BENNY SUSI

PHONE: _____

FAX: 352-336-6603

FROM: JOHN REYNOLDS

PHONE: _____

Division of Air Resources Management

FAX: 850.922.6979

RE: _____

CC: _____

Total number of pages including cover sheet: _____

Message

MORE COMMENTS FROM DERM.
PLEASE RESPOND TO DERM'S CONCERNS.

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

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METROPOLITAN DADE COUNTY, FLORIDA



Department of Environmental Resources Management
33 S.W. 2nd Avenue
Miami, FL. 33130-1540

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SEND TO:

Name: John Reynolds

Company/Department: DET / DARM

Phone Number: (850) 488-0114

Fax Number: (850) 922-6979

Message:

FROM:

Name: Marcelo Barros

Division/Section: Air Quality Mgt. Div. / APS

Phone Number: (305) 372-6944

Fax Number: (305) 372-6954

Date: 6/19/2000

Number of Pages (including this one):

3

MIAMI-DADE COUNTY, FLORIDA



ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-8925
FAX: (305) 372-8854

June 16, 2000

Department of Environmental Protection
Air Resources Management
New Source Review Section
2600 Blair Stone Road
Tallahassee, Fl 32399-2400
Attention: John Reynolds

DEP FILE 0250407-003-AC

RE: Nailite International, Inc.- New Panel Finishing Spray Line

PSD-FL-289

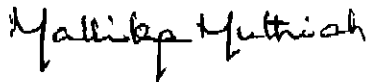
Based on our telephone conference with Mr. Benny Susi of Nailite on June 7th, and his subsequent letter dated June 13, 2000, DERM would like the following comments to be included as part of Nailite's PSD permit application review:

1. As mentioned in my letter dated May 25, 2000, a 10% fugitive emissions will result in an overall efficiency of only 86%. As you know, Mr. Susi has indicated in his letter that the actual fugitive emissions are close to 2 percent rather than the 10 percent as estimated in the application. Since a higher capture efficiency is claimed, it is prudent that DEP require them to have a minimum 95% capture efficiency. The emissions from these operations are only HAPs. Therefore, it is essential to conform to this requirement due to the potential for public sanitary nuisance.
2. As Mr. Susi stated in his letter, the equipment is new and has not been tested. Therefore, it is absolutely necessary for the facility to conduct an initial performance test to determine the capture efficiency of the new control equipment. DERM recommends DEP to make the performance test as a requirement in the construction permit to establish the minimum 95% capture efficiency.
3. Nailite must commit to consolidate and connect the existing operation (AV 0250407) to the Thermal Oxidizer by a specific date acceptable to the regulatory agency. The consolidated operation must meet the required minimum capture efficiency of 95%.

For your information, our staff Marcelo Barros and Frank Echanique conducted an inspection of the existing operation and the on-going new construction on June 14, 2000.

I will be out of the office during the next week. If you have any questions regarding this memo, please contact Marcelo Barros or Frank Echanique at (305) 372-6925.

Sincerely,



Mallika Muthiah, P.E., Chief,
Air Facilities Section
Miami-Dade County D.E.R.M.

Golder Associates Fax

To: JOHN REYNOLDS

Fax Number: 850-922-6979

Company: DEP

Date: JUNE 13, 2000

From: BENNY SUSI

e-mail: @golder.com

Our ref: 003-7523

Voice Mail:

RE:

Total pages (including cover): 7

Hard copy to follow

MESSAGE



6241 NW 23rd St, Suite 500

Gainesville, FL 32653

U.S.A.

Telephone: (352) 336-5600

Fax: (352) 336-6603

**Comprehensive Consulting
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Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



June 13, 2000

0037523A/04

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL, 32399-2400

Attention: A. A. Linero, P.E.

RE: NAILITE INTERNATIONAL, INC. - NEW PANEL FINISHING SPRAY LINE
DEP FILE NO. 0250407-003-AC(PSD-FL-289)

Dear Mr. Linero:

To follow-up on our telephone conversation with Ms. Muthiah of DERM concerning fugitive emissions associated with the new spray line. Golder Associates Inc. (Golder), on behalf of Nailite International, has prepared the following response:

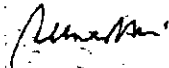
As discussed, Nailite through its coating supplier, Strathmore Products Inc. conducted three evaporation tests to determine how much solvent would evaporate from the sprayed film over 90 seconds. The evaporation tests along with travel time of products through the spray line resulted in estimated fugitive emissions from the spray line. A copy of Strathmore test results, a schematic of the spray line, and fugitive emission calculations are attached to this letter.

The attached schematic presents fugitive emission calculations based on the evaporation test conducted by Strathmore. The emission calculations are based on 1-mil wet film applied on each panel at each spray booth. The estimated solvent lost outside the booth is estimated to be 2 percent.

Due to the nature of this new technology, the applicant had included a very conservative estimate of potential fugitive emissions. As demonstrated in this response, the actual fugitive emissions are closer to 2 percent rather than the 10 percent as estimated in the application. The applicant requests that no limit on fugitive emissions be included in the air construction permit due to the fact that the equipment is new and has not been tested.

Please call if you have any questions concerning this information.

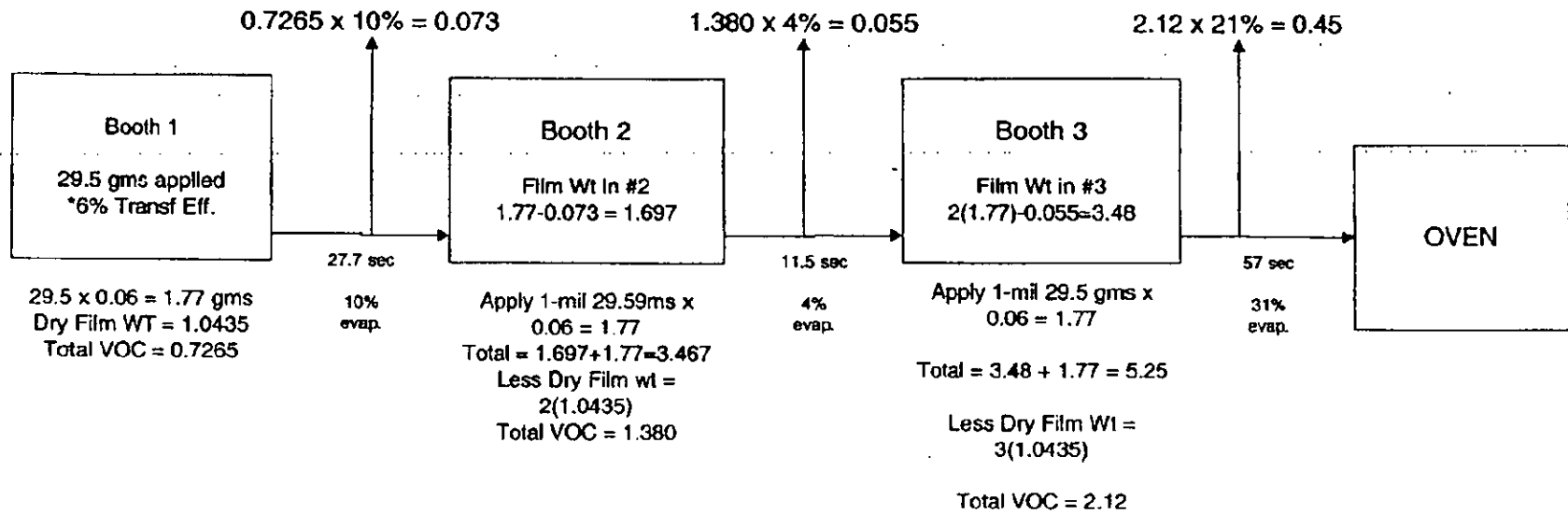
Sincerely,
GOLDER ASSOCIATES INC.


Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/jkw

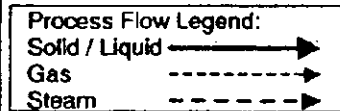
cc: David Steedman, Nailite
David Buff, Golder

FUGITIVE EMISSIONS:



TOTAL FUGITIVES = 0.073 + 0.055 + 0.45 = 0.5785 GMS
 PERCENT FUGITIVES = 0.578 / 29.5 X 100 = 1.95%

1. Transfer efficiency based on laboratory results.
2. Test results Evaporation rates are based on elapsed time as reported by the Strathmore Laboratory.



Process Flow Diagram for Fugitive Emissions
 Nailite International, Inc.

Latest Revision Date: 6/12/00



Strathmore Products, Inc.

FORMULATORS AND MANUFACTURERS OF CHEMICAL COATINGS - PAINTS - ENAMELS - LACQUERS

RECEIVED MAY 01 2000

April 26, 2000

Dave Steedman
Nalite International
1251 Northwest 165th Street
Miami, FL 33169

Dear Dave:

Per your request, three evaporation tests were run at Strathmore to determine how much solvent would evaporate from a sprayed film in 90 seconds.

I randomly chose the light buff coating I35-0093, C-690. After thorough mixing, seven ounces of I35-0093 was reduced with three ounces of solvent or solvent blend and added to the cup of a cup gun. The cup was then attached to the suction feed gun and the assembly was weighed on a digital pound scale. A 3 x 5 inch cold rolled steel panel was then sprayed at 40 pounds atomization. The panel was then rushed to a digital analytical balance where the timed weights were taken. The doors of the analytical balance were left open to allow air flow over the panel. The steel panel was reweighed after an overnight dry on the digital analytical balance to determine its final dry weight.

Tests #1 and #2 were sprayed from the same ten-ounce sample.

The following results were obtained:

Strathmore Products, Inc.

-file

nailite evaporation page 2

Test 1

- Reduce paint, 70 parts paint to 30 parts acetone
- Weigh cup gun prior to spraying panel and after spraying
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- Measure panel weight every 10 seconds
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80	75.0652	32.4
90	75.0312	37.6

Strathmore Products, Inc.

nalite evaporation page 3

Test 2

- Reduce paint, 70 parts paint to 30 parts acetone
- Weigh cup gun prior to spraying panel and after spraying
- Spray a 3 x 5 inch steel panel to 2 mils dry film thickness
- Measure panel weight every 10 seconds
- Report % solvent evaporated after 90 seconds

Temperature 77°F
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80	76.1403	23.0
90	76.1113	25.6

Strathmore Products, Inc.

nalite evaporation page 4

Test 3

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- Weigh cup gun prior to spraying panel and after spraying
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- Report % solvent evaporated after 90 seconds

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Uncoated Panel 74.1115 gms
 Wet Panel 76.6710 gms Wet Film Weight = 2.5595 gms
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40	76.4970	14.9
50	76.4710	17.1
60	76.4260	21.0
70	76.3990	23.3
80	76.3650	26.2
90	76.3400	28.4

If you have any questions, please feel free to call.

Sincerely,

David Harwood (s)

David Harwood
Senior Chemist
DH/ll

labharwoodnalite 4-20-00

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

RECEIVED

JUN 12 2000



BUREAU OF AIR REGULATION

June 9, 2000

0037523A/5

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: A. A. Linero, P.E.

RE: NAILITE INTERNATIONAL, INC. – NEW PANEL FINISHING SPRAY LINE
DEP FILE NO. 0250407-003-AC(PSD-FL-289)

Dear Mr. Linero:

In response to a letter from U.S. Environmental Protection Agency (EPA), Golder Associates Inc. (Golder), on behalf of Nailite International, has prepared the following response:

1. EPA's statement on the applicability of MACT to HAP and BACT to criteria pollutants, and that in this case the MACT and BACT happen to be the same since an RTO effectively controls both the HAP and VOC is acknowledged.
2. The applicant investigated in the use of low-VOC materials such as HAPs free solvents and waterborne coatings prior to selecting the RTO. Using a HAP free coating would result in a \$1.4 million per year additional operating cost that would make the facility non-competitive. The use of waterborne coatings would require 4 years of testing to provide the same level of warranty on the product that is currently provided to customers. Since Nailite's paint adhesion is a function of the paint, any variation of their existing formula would require extensive testing to certify its intended use. Therefore, the case-by-case BACT/MACT determination concluded that an RTO was the appropriate control technology.

Please call if you have any questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Benny Susi'.

Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/arz

cc: David Steedman, Nailite
David Buff, Golder

CC: J. Reynolds, BAR
JED
NPS
EPA
Aade Co.

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



June 5, 2000

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL, 32399-2400

RECEIVED
JUN 06 2000
BUREAU OF AIR REGULATION

Attention: A. A. Linero, P.E.

RE: NAILITE INTERNATIONAL, INC. – NEW PANEL FINISHING SPRAY LINE
DEP FILE NO. 0250407-003-AC(PSD-FL-289)

Dear Mr. Linero:

In response to a letter from Dade County Air Quality Management Division, Golder Associates Inc. (Golder), on behalf of Nailite International, has prepared the following response:

1. The maximum paint usage of 300,000 gallons per year includes solvents that are pre-mixed into the formula as well as those used to dilute the paint and clean-up. Of the total volume of paint used approximately 50 percent are solvents added to the paint.
2. The applicant in arriving at a case-by-case BACT/MACT determination concluded that an RTO was the appropriate control technology. The application of the RTO will include both the proposed and existing spray lines, thus providing a case-by-case MACT determination for the entire facility.
3. The MACT emission limitation recommended by the applicant includes a state-of-the-art spray booth and an RTO. The recommended control is the most stringent control achieved in practice by the best controlled similar source as demonstrated in the PSD application on file with DEP and, therefore, satisfies the case-by-case MACT.
4. The discrepancy in the hourly paint use between the existing and proposed paint lines is associated with the improve technology that allows for a more efficient transfer of paint. The maximum coating use for the new spray line will remain at 300,000 gallons per year under this new technology.

Please call if you have any questions concerning this information.

Sincerely,
GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Benny Susi'.

Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/jkw

cc: David Steedman, Nailite
David Buff, Golder

CC: J. Reynolds, BAR
SED
NPS
EPA
Dade Co

Golder Associates Inc.
1801 Clint Moore Road, Suite 200
Boca Raton, FL USA 33487
Tel: (561) 994-9910
Fax: (561) 994-9393

RECEIVED



JUN 06 2000

BUREAU OF AIR REGULATION

June 5, 2000

0037523A/02

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL, 32399-2400

Attention: A. A. Linero, P.E.

RE: NAILITE INTERNATIONAL, INC. - NEW PANEL FINISHING SPRAY LINE
DEP FILE NO. 0250407-003-AC(PSD-FL-289)

Dear Mr. Linero:

In response to our telephone conversation requesting clarification of response No. 2 of our letter dated May 9, 2000, Golder Associates Inc. (Golder), on behalf of Nailite International, has prepared the following response.

The existing paint line that will be relocated to the new building will maintain its maximum paint usage of 300,000 gallons per year and the maximum VOC content of 6 pounds of VOC per gallon of coatings. Although the actual VOC emissions from the existing paint line are about 350 tons per year in 1999, these actual emissions are expected to be reduced to 130.5 tons per year since the existing paint line will be connected to the RTO. The applicant has no objection to including the RTO control of the existing paint line as part of the air construction permit requested.

Please call if you have any questions concerning this information.

Sincerely,
GOLDER ASSOCIATES INC.

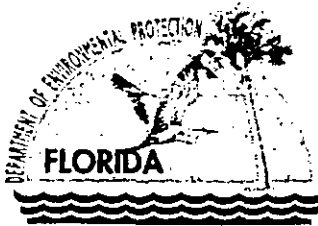
A handwritten signature in black ink, appearing to read "Benny Susi".

Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/jkw

cc: David Steedman, Nailite
David Buff, Golder

cc: J. Reynolds, BAR
SED
NPS
EPA
Ade CO.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 31, 2000

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. David G. Steedman
Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

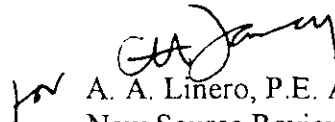
Re: DEP File No. 0250407-003-AC (PSD-FL-289) - New Panel Line

Dear Mr. Steedman:

The Bureau of Air Regulation received today the enclosed letter from the EPA concerning the referenced permit application. Please address the issues raised in the EPA's letter.

If there are any questions regarding the above, please call John Reynolds at 850/921-9536.

Sincerely,


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

Enclosure

AAL/JR

cc: Gregg Worley, EPA
John Bunyak, NPS
Isidore Goldman, SED
Patrick Wong, DCDERM
Benny Susi, Golder Assoc.

Z 341 355 305

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0250407-003-AC		
PO0-F1-289		

PS Form 3800, April 1995

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	3. Article Addressed to: Mr. David Steedman Vice President of Operations Nailite International 1111 NW 165th St. Miami, FL 33169
5. Received By: (Print Name) SUE AMDUR	7. Date of Delivery 6/5
6. Signature: (Addressee or Agent) X Sue Amdur	8. Addressee's Address (Only if requested and fee is paid)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAY 31 2000

BUREAU OF AIR REGULATION

MAY 25 2000

4 APT-ARB

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

SUBJ: PSD Permit Application for Nailite International, Inc. located in Miami (Dade County),
Florida PSD-FL-289

Dear Mr. Linero:

Thank you for submitting the above referenced PSD permit application (dated April 19, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the construction of a panel finishing spray line which will operate in conjunction with existing operations located in Miami. The new line consisting of three spray booths and a curing oven will have the capacity to process 1,400 polypropylene "shingles" per hour. The total emissions increase of volatile organic compounds (VOC) from the proposed project is above the significance threshold requiring Prevention of Significant Deterioration (PSD) review.

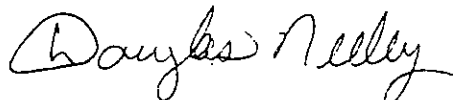
Based on a review of the permit application, EPA has the following comments:

1. In Section 5.3 of the permit application, it is stated that, by definition, Maximum Achievable Control Technology (MACT) is more stringent than Best Available Control Technology (BACT). This statement is somewhat misleading in that MACT and BACT apply to different classes of pollutants; MACT applies only to hazardous air pollutants (HAP) whereas BACT typically applies to criteria pollutants. In this particular case, MACT and BACT just happen to be the same since regenerative thermal oxidization (RTO) effectively controls the emissions of both toluene (a HAP) and VOC (a criteria pollutant).
2. Although RTO appears to be the most effective add-on control for both toluene and VOC, the applicant should have addressed the feasibility of other potential control options such as the use of low-VOC materials. When used in conjunction with the RTO technology, this particular control option would undoubtedly result in further reduced emissions of both toluene and VOC. Even in the event that such an option were determined to be "technically infeasible" (e.g., the use of low-VOC materials

would compromise the quality of the product), the permit application still needs to identify the option and discuss why it was not selected as BACT.

Thank you for the opportunity to comment on the Nailite International permit application. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118. EPA will inform the Florida Department of Environmental Protection by separate correspondence should there be any comments or suggestions regarding the applicant's ambient air quality impact analysis.

Sincerely,



R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

CC: J. Reynolds
SED

NPS

B. Susi, Halder Assoc.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 25, 2000

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. David G. Steedman
Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

Re: DEP File No. 0250407-003-AC (PSD-FL-289) - New Panel Line

Dear Mr. Steedman:

The Bureau of Air Regulation received today the enclosed faxed letter from the Dade County Air Quality Management Division concerning the referenced permit application. Please address the issues raised in Dade County's letter.

If there are any questions regarding the above, please call John Reynolds at 850/921-9536.

Sincerely,

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

Enclosure

AAL/JR

cc: Gregg Worley, EPA
John Bunyak, NPS
Isidore Goldman, SED
Patrick Wong, DCDERM
Benny Susi, Golder Assoc.

Z 341 355 298

US Postal Service
Receipt for Certified Mail
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David Steedman	
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Mailite Internat'l	
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Postage	\$
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0250407-003-AC	
P50-FI-289	

PS Form 3800, April 1995

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

1. Article Addressed to:
Mr. David Steedman
Vice President of Operations
Mailite Internat'l, Inc
1111 NW 165th St.
Miami, FL 33169

COMPLETE THIS SECTION ON DELIVERY

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

C. Signature
X *[Signature]* Agent
 Addressee

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If YES, enter delivery address below: No

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MIAMI-DADE COUNTY, FLORIDA



ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE

SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

May 25, 2000

Department of Environmental Protection
Air Resources Management
New Source Review Section
2600 Blair Stone Road
Tallahassee, Fl 32399-2400
Attention: John Reynolds

RE: Nailite International, Inc.- New Panel Finishing Spray Line

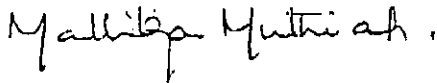
The DERM's Air Facilities Section has received a copy of the PSD application for Nailite International, (ARMS # 0250407).

The PSD rule requires the permitting authority, FDEP in this case, to make a determination of the Best Available Control Technology (BACT) and Maximum Achievable Control Technology (MACT) for certain proposed projects at major facilities that result in increased emissions. Because Nailite is located in Miami-Dade County, the DERM is offering the following comments for your consideration:

1. Based on the information provided in the PSD application, and on a telephone conversation between Mr. Frank Echanique of this office and Mr. David Buff of Golder Associates on May 23, 2000, it was confirmed that the existing facility will continue using a maximum of 300,000 gal/year of paints and solvents. Furthermore, the new facility will have a maximum usage rate of an additional 300,000 gal/year of paints and solvents. The application indicates that the 300,000 gal/year is solely paint. DERM suggests that DEP obtain the breakdown of paints and solvents usage in the new facility.
2. The Miami-Dade County DERM believes that both the existing and the new operations should be considered comprehensively in reviewing the construction application, and arriving at a BACT/MACT determination. The correct approach would be to perform a case-by-case MACT determination for the entire facility.

3. Considering the fact that the potential emissions from the added operations will be more than 900 ton/year, and the proposed capture efficiency of only 90%, there will be an estimated 90TPY (10%) of uncontrolled HAPs emissions just from the new facility. This 90% capture efficiency is not acceptable, since this may conceivably result in a public sanitary nuisance to the surrounding area, as well as undue exposure to the workers. Taking into account the 10% fugitive emissions, the overall control efficiency will be only 86% and is not appropriately reflective of the MACT.
4. Based on the review of the Title V permit for the existing facility, the paint usage is 300,000 gal/year, and the authorized maximum hourly paint usage is 34.3 gal/hour. Although the PSD application for the new facility indicates a proposed paint usage of the same 300,000 gal/year, the maximum hourly paint usage is 61 gal/hour. DERM would like the applicant to explain this apparent discrepancy.

Sincerely,



Mallika Muthiah, P.E., Chief,
Air Facilities Section
Miami-Dade County D.E.R.M.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

RECEIVED

MAY 31 2000

BUREAU OF AIR REGULATION

MAY 25 2000

4 APT-ARB

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

SUBJ: PSD Permit Application for Nailite International, Inc. located in Miami (Dade County),
Florida PSD-FL-289

Dear Mr. Linero:

Thank you for submitting the above referenced PSD permit application (dated April 19, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the construction of a panel finishing spray line which will operate in conjunction with existing operations located in Miami. The new line consisting of three spray booths and a curing oven will have the capacity to process 1,400 polypropylene "shingles" per hour. The total emissions increase of volatile organic compounds (VOC) from the proposed project is above the significance threshold requiring Prevention of Significant Deterioration (PSD) review.

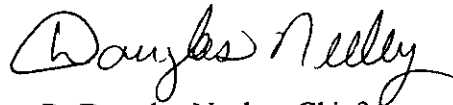
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Thank you for the opportunity to comment on the Nailite International permit application. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118. EPA will inform the Florida Department of Environmental Protection by separate correspondence should there be any comments or suggestions regarding the applicant's ambient air quality impact analysis.

Sincerely,



R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

CC: J. Reynolds
SED
NPS
B. Susi, Golden Assoc.



RECEIVED

MAY 30 2000



BUREAU OF AIR REGULATION

ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

May 25, 2000

Department of Environmental Protection
Air Resources Management
New Source Review Section
2600 Blair Stone Road
Tallahassee, Fl 32399-2400
Attention: John Reynolds

RE: Nailite International, Inc.- New Panel Finishing Spray Line

The DERM's Air Facilities Section has received a copy of the PSD application for Nailite International, (ARMS # 0250407).

The PSD rule requires the permitting authority, FDEP in this case, to make a determination of the Best Available Control Technology (BACT) and Maximum Achievable Control Technology (MACT) for certain proposed projects at major facilities that result in increased emissions. Because Nailite is located in Miami-Dade County, the DERM is offering the following comments for your consideration:

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Sincerely,

Mallika Muthiah

Mallika Muthiah, P.E., Chief,
Air Facilities Section
Miami-Dade County D.E.R.M.

CC: *J. Reynolds*
EPA
NPS
SED
B. Susi, Golden Assoc.

MIAMI-DADE COUNTY, FLORIDA



ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
33 S.W. 2nd AVENUE
SUITE 900
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May 25, 2000

Department of Environmental Protection
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2600 Blair Stone Road
Tallahassee, Fl 32399-2400
Attention: John Reynolds

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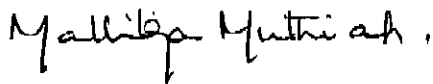
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Sincerely,



Mallika Muthiah, P.E., Chief,
Air Facilities Section
Miami-Dade County D.E.R.M.

METROPOLITAN DADE COUNTY, FLORIDA



Department of Environmental Resources Management
33 S.W. 2nd Avenue
Miami, FL 33130-1540

SEND TO:

Name: John Reynolds

Company/Department: DEP / DERM

Phone Number: 1-850-488-0114

Fax Number: 1-850-922-6979

Message:

FROM:

Name: Mallika Murtiyan

Division/Section: AQMD / AFS

Phone Number: 305-372-6921

Fax Number: (305) 372-6954

Date: 5/25/00

Number of Pages (including this one):

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NO. 731 P. 1/2

METROPOLITAN DADE COUNTY, FLORIDA



Department of Environmental Resources Management
33 S.W. 2nd Avenue
Miami, FL 33130-1540

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X

SEND TO:

Name: Al Linero
Company/Department: FDEP - DARM
Phone Number: _____
Fax Number: (850) 922-6979

Message: FYI. Here's the letter we discussed today. Thanks for your time this afternoon.

Industrial
surrounding
means need
Enclosed I have

I would like

FROM:

Name: Debbie Griner
Division/Section: AQMD
Phone Number: _____
Fax Number: (305) 372-6936
Date: 5/15/00

Number of Pages (including this one): 2

T
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Golder Associates Inc.
1801 Clint Moore Road, Suite 200
Boca Raton, FL USA 33487
Tel: (561) 994-9910
Fax: (561) 994-9393



May 9, 2000

0037523

**Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL, 32399-2400**

BUREAU OF AIR REGULATION

MAY 12 2000

RECEIVED

Attention: A. A. Linero, P.E.

**RE: Nailite International, Inc. – New Panel Finishing Spray Line
DEP File No. 0250407-003-AC(PSD-FL-289)**

Dear Mr. Linero:

In response to your letter dated May 4, 2000, requesting additional information, and our telephone conversation of May 8, Golder Associates Inc. (Golder), on behalf of Nailite International has prepared the following responses:

- 1. The specific chemicals that comprise the VOCs in the coatings are toluene and xylene. No other HAPS are present in the chemical composition of the paints used. A Material Safety Data Sheet was previously submitted indicating toluene at 68.96 percent by weight and xylene at 1.50 percent. The attached MSDS presents the chemical composition by weight of the other ingredients not included in the MSDS on file with FDEP.**
- 2. The existing paint line will be relocated to the new building once the new paint line is operational. Based on the maximum paint usage of 300,000 gallons per year, and the maximum VOC content of 6 lb of VOC per gallon of coatings for the existing paint line, the maximum emissions for the existing paint line will be 900 TPY of VOC. However, actual VOC emissions from the existing paint line are about 350 TPY, and these actual emissions are expected to remain similar to this in the future. The attached table presents the maximum potential emissions from the existing paint line (uncontrolled).**

Nailite is currently considering venting the emissions from the relocated existing paint line to the new RTO. However, Nailite has chosen not to include the existing paint line in the application for the new paint line since the reduction in emissions from the existing paint line would be significant and would provide Nailite with emission credits in any future expansion of the facility (i.e., within the 5-year PSD contemporaneous period).

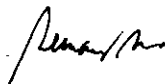
To reiterate, Nailite is not including the existing paint line in this application. For permitting purposes, the existing paint line will only be relocated a few hundred feet away. All current air permit conditions related to the existing paint line will continue to apply.

3. Attached is the revised page 3-4 of part B of the PSD application.
4. Attached as part of this response is ADWEST Technologies, Inc. technical specifications for the proposed RTO. It should be noted that the RTO does not have a concentrator. Additionally, a flow diagram indicating the air flows from the various components of the new paint line to the RTO are attached along with the estimated cost effectiveness of the control device.

Please call if you have any questions concerning this information.

Sincerely,

GOLDER ASSOCIATES INC.



Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042
Seal

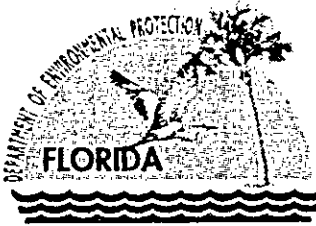
BS/jkk

Enclosures

cc: David Steedman, Nailite
David Buff, Golder

\\GATORBAIT\DP\Projects\2000\0037\0037523Y Nailite\PI\WP\attachments\#01ltr.doc

cc: J. Reynolds, BAR
EPA
NPS
SED
Dade Co



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 4, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David G. Steedman
Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

Re: DEP File No. 0250407-003-AC (PSD-FL-289)
New Panel Line

Dear Mr. Steedman:

The Bureau of Air Regulation reviewed the referenced application received on April 17 and found that additional information is required. The completeness items are listed below.

1. Identify the specific chemical compounds comprising the VOCs (28% of total vapor emissions) that will be emitted in addition to the toluene and xylene emissions specified (78% of total VOCs). (Rule 62-212.400, F.A.C.).
2. Show emission calculations for the existing equipment after it is relocated to the new building following startup of the new line. (Rule 62-212.400, F.A.C.).
3. The application states that since "MACT exceeds BACT by definition" and that "MACT is more stringent than BACT", "MACT will be considered as satisfying BACT requirements." To the contrary, there are cases where BACT can be considerably more stringent than MACT (e.g., fluoride limits for the phosphate industry). In the absence of a separate case-by-case MACT Determination, please change the language at the end of Section 3.1.2 (page 3-4) of the application as indicated below:

*"~~MACT BACT is more stringent than~~ equivalent to ~~BACT MACT~~ in this instance.
Therefore, for the purposes of this application, ~~MACT BACT~~ will be considered as
satisfying ~~BACT MACT~~ requirements."*

(Rule 62-204.800(10)(d)2., F.A.C.).

4. Submit a diagram or picture of the internals of the specific RTO proposed along with the manufacturer's equipment description and range of performance specifications and indicate if a concentrator will be utilized. Provide a diagram showing air circulation/ventilation rates for the building and process equipment and show calculations for the estimated cost effectiveness of the control device. (Rule 62-212.400, F.A.C.)

Mr. David G. Steedman
Page 2 of 2
May 4, 2000

If there are any questions regarding the above, please call John Reynolds at 850/921-9536.

Sincerely,



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

AAL/JR

cc: Gregg Worley, EPA
John Bunyak, NPS
Isidore Goldman, SED
Patrick Wong, DCDERM
Benny Susi, Golder Assoc.

Strathmore Products, Inc.

FORMULATORS AND MANUFACTURERS OF CHEMICAL COATINGS - PAINTS - ENAMELS - LACQUERS

May 9, 2000

Mr. David Steedman
Nailite International
1251 Northwest 165th Street
Miami, FL 33169

Dear Mr. Steedman:

I am writing in response to a request by Bennie Sussey of Golder Associates. The following is a percent by weight breakdown of the components in Strathmore Products, Inc., Plasticel Black Coating, B35-0082:

Resin	20.20 %
Pigment	9.41 %
Xylene	1.44 %
Toluene	68.95 %

If any additional information is needed, please feel free to call.

Sincerely,



David Harwood
Senior Chemist

DH/ll

cc: Bennie Sussey
Tom Burr, Strathmore CEO
John Good, Strathmore, Technical Director

lab/harwood/nailite
5-9-00

Attachment NI-EU1-H8b. Maximum Potential VOC Emissions for No. 1 Spray Line, Nallite

Product	Maximum Paint Usage		Maximum VOC Content (lb/gal)	Potential Uncontrolled VOC		Fugitive Emissions ^a		VOC to Thermal Oxidizer ^b		VOC from Thermal Oxidizer ^c		Total VOC Emission	
	(gal/hr)	(gal/yr)		(lb/hr)	(TPY)	(lb/hr)	(TPY)	(lb/hr)	(TPY)	(lb/hr)	(TPY)	(lb/hr)	(TPY)
<u>Coatings</u>													
Annual	--	300,000	6.0	--	900.0	--	90.0	--	810.0	--	40.5	--	130.5

Note:

^a Based on estimated 90% capture of VOC in paint booths and 10% fugitive emissions.

^b Based on 90% capture of VOC in paint booths.

^c Based on 95% VOC destruction in thermal oxidizer.

The top-down BACT approach essentially starts with the most stringent (or top) technology and emissions limit that have been applied elsewhere to the same or a similar source category. The applicant must next provide a basis for rejecting this technology in favor of the next most stringent technology or propose to use it. Rejection of control alternatives may be based on technical or economic infeasibility. Such decisions are made on the basis of physical differences (e.g., fuel type), locational differences (e.g., availability of water), or significant differences that may exist in the environmental, economic, or energy impacts. The differences between the proposed facility and the facility on which the control technique was applied previously must be justified. EPA has issued a draft guidance document on the top-down approach entitled *Top-Down Best Available Control Technology Guidance Document* (EPA, 1990).

MACT requirements apply to all new major sources of HAPs (i.e., greater than 10 TPY of any single HAP, or greater than 25 TPY of total HAPs). MACT is defined in Rule 62-204.800(10)(d)2., F.A.C., as:

An emissions limitation not less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority. Based on the available information, ...the maximum degree of reduction in emissions of HAP which can be achieved by utilizing those controls technologies that can be identified from available information, taking into consideration costs of achieving such emission reduction and any non-air quality health and environmental impacts and energy requirements associated with the emission reduction.

BACT is equivalent to MACT in this instance. Therefore, for the purposes of this application, BACT will be considered as satisfying MACT requirements.

3.1.3 AIR QUALITY MONITORING REQUIREMENTS

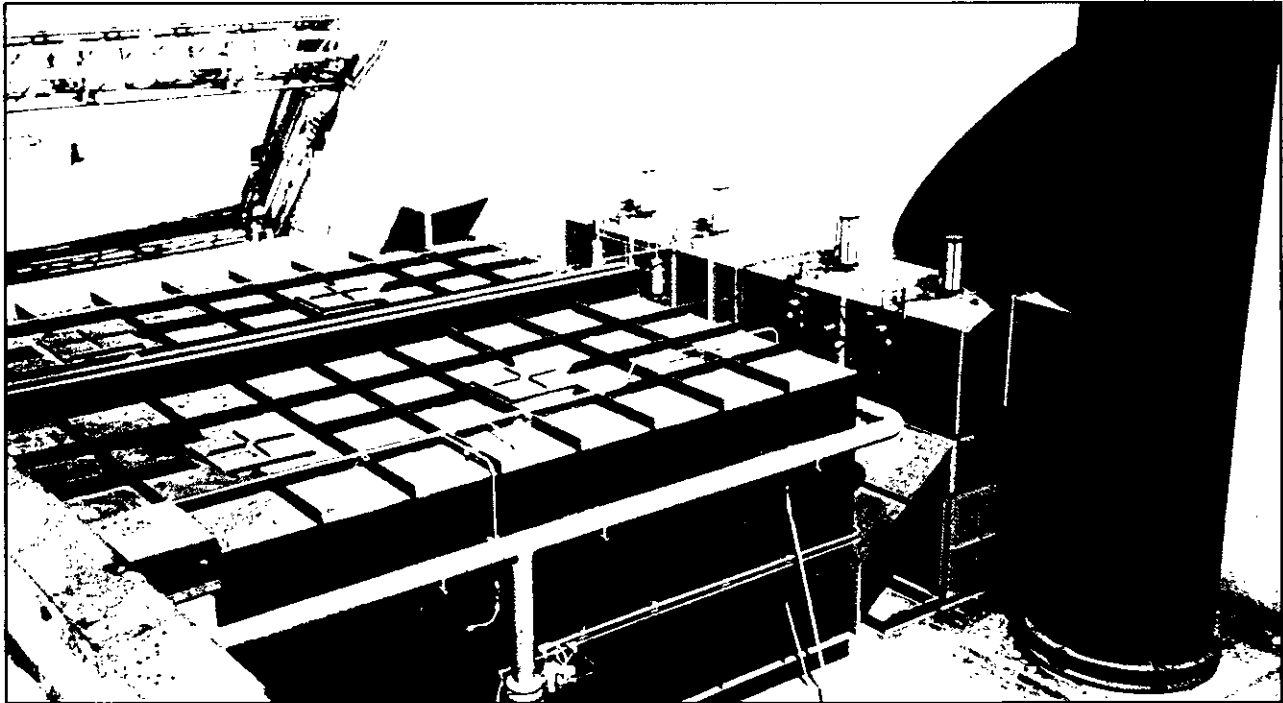
In accordance with requirements of 40 CFR 52.21(m) and Rule 62-212.400(5)(f), F.A.C., any application for a PSD permit must contain an analysis of continuous ambient air quality data in the area affected by the proposed major stationary facility or major modification. For a new major facility, the affected pollutants are those that the facility potentially would emit in significant amounts. For a major modification, the pollutants are those for which the net emissions increase exceeds the significant emission rate (see Table 3-1).



ADWEST TECHNOLOGIES, INC.

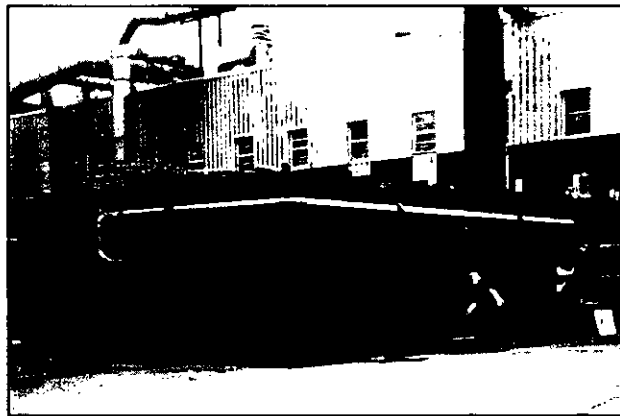


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- RETOX® RTO Twin Bed Regenerative Thermal Oxidizer Systems
- RETOX RCO Catalytic Oxidizers
- Airex Poppet Damper Tees
- Skid Mounted
- Shop Assembled/Tested Modules
- Single Source Turnkey Installations
- Lease Finance Options
- TEL-MAX Telemetry/PLC Controls/Remote Diagnostics
- Special Halogenated Designs

E-mail or Call Us Today for a Free Catalog or RETOX Proposal



CORPORATE OFFICE
 1175 NORTH VAN HORNE WAY
 ANAHEIM, CA 92806-2506
 TEL: (714) 632-9801
 FAX: (714) 632-9812
 E-MAIL: adwestusa@ioc.net

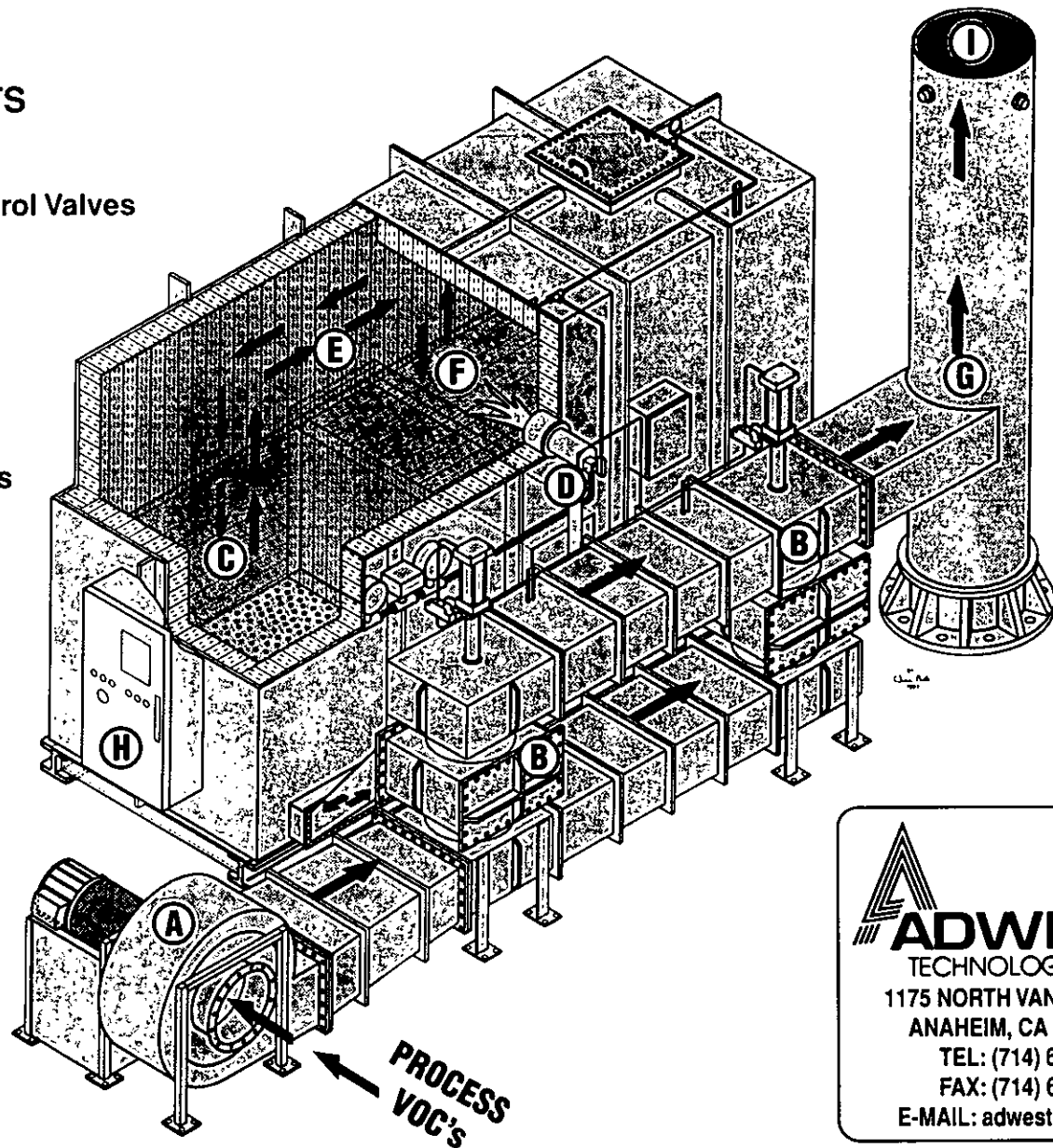
EAST COAST OFFICE
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 E-MAIL: adwestny@eznet.net

Visit our website: adwestusa.com

RETOX[®] TWIN BED REGENERATIVE THERMAL OXIDIZERS

MAJOR RETOX[®] TWIN BED RTO OXIDIZER COMPONENTS

- (A) Forced Draft Fan
- (B) Twin Airex Poppet Flow Control Valves
- (C) Heat Exchange Bed #1
- (D) IRI/FM Burner/Piping Train
- (E) Combustion Chamber
- (F) Heat Exchange Bed #2
- (G) Exhaust Stack with Test Ports
- (H) PLC Controls with Tel-Max Telemetry Diagnostics
- (I) Purified Exhaust ($\text{CO}_2 + \text{H}_2\text{O}$ Vapor)



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 **ADWEST**
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ADWEST TECHNOLOGIES, INC.

ANAHEIM, CALIFORNIA

RETOX[®] REGENERATIVE THERMAL OXIDIZER SYSTEM

BY ADWEST/AIREX

PROPOSAL FOR

NAILITE INTERNATIONAL

MIAMI, FLORIDA

OUR REFERENCE: PROPOSAL NO. 00-4367

MARCH 24, 2000



March 24, 2000

Nailite International
1251 NW 165th Street
Miami, Florida 33169

Attention: Mr. David Steedman

Reference: RETOX[®] Twin Bed Regenerative Thermal Oxidizer System
Application: Paint Process VOC Emissions
Our Reference: Proposal No. 00-4367

Dear Mr. Steedman:

We are pleased to submit our proposal covering the supply and installation of one (1) RETOX[®] 27.0 RTO95 Twin Bed Regenerative Thermal Oxidizer system manufactured by Adwest/Airex Corporation for your process emission control project in Miami, Florida. The RETOX[®] regenerative thermal oxidizer provides a lower cost and higher efficiency alternative to present oxidizer systems used for low solvent loading processes. The oxidizer quoted in this proposal is designed to destroy greater than 98% of volatile organic compounds (VOC's) and provide 95% primary heat recovery effectiveness which provides fuel free operation above inlet solvent loadings of approximately 3% of L.E.L.

Each weather tight RETOX[®] RTO module is shop-assembled on a compact skid which minimizes field assembly and installation costs and time. The system uses an energy saving forced draft design and utilizes a natural gas burner for rapid 1 hour cold start-up. An integral Allen Bradley PLC control system with TEL MAX telemetry features provides automatic system operation and remote diagnostics. Also there are no expensive catalyst, carbon bed additives or structured block media to replace and maintain.

Adwest/Airex RETOX[®] regenerative oxidizer systems provide a cost effective solution to industrial VOC, odor and air toxics control, with minimal capital, operating and installation costs. Our oxidizer systems have been successfully installed on a wide variety of VOC and odor control processes including web offset printing, converting, coating, pharmaceutical, chemical, paint finishing and flexible packaging applications with such clients as 3M Company, Fisher Printing, Masterchem Paints, Fry Communications, Times Litho, Occidental Chemical, American Packaging, Atlantic Press, Hexcel Composites, Toshiba, Neff Printing, GenCorp, General Business Forms, Allied Signal, Photocircuits, CSD Packaging, Concord Litho and Mitsubishi.


March 24, 2000
Nailite International
Page 2.

In summary, the RETOX® Twin Bed regenerative thermal oxidizer provides a cost effective, low maintenance and affordable solution to VOC and odor control, combined with high efficiency heat recovery, low system pressure drop, flameless operation, rapid startup and zero leakage with our unique Airex vertical poppet valves with soft step seating. Adwest Technologies' extensive VOC control heat recovery and Turnkey installation experience of over 450 RETOX® RTO oxidizer systems since 1988, provides you, with a proven, responsive and focused engineering and technical support team dedicated to cost effective VOC control solutions.

We would be pleased to meet with you at your convenience, to further discuss this proposal and the RETOX® regenerative thermal oxidizer system benefits and advantages. If you have any questions or would like additional information, please feel free to call myself or Mr. Brian Cannon of our East Coast office. We also invite you to visit our dedicated Anaheim, California engineering and fabrication headquarters facilities anytime to see our quality RETOX® RTO systems firsthand.

Very truly yours,

ADWEST TECHNOLOGIES, INC.


Joseph R. Terry

JRT:mae

Attachments

CC: Brian Cannon-Adwest (East Coast office) (716) 593-1405

ADWEST TECHNOLOGIES, INC.

RETOX® TWIN BED RTO OXIDIZER GENERAL DESCRIPTION

INTRODUCTION:

The RETOX® twin bed RTO Regenerative Thermal Oxidizer System provides a cost effective way for solvent-laden gas to be converted into carbon dioxide and water vapor.

EQUIPMENT:

The RETOX® oxidizer consists of a reinforced, insulated twin bed chamber filled with ceramic heat exchanger media. The gas flow is automatically controlled by a zero leakage poppet valve mechanism which changes the direction of the gas flow at regular intervals via an integral programmable logic control (PLC) system. An external burner is used only for initial cold startup, typically 1 hour.

PROCESS COMBUSTION:

Due to the abundant oxygen content of the process gas, complete combustion readily occurs when the ignition point is reached in the oxidizer (typically 1600-1700°F). Process hydrocarbons are converted to carbon dioxide and water vapor. With a sufficient concentration of solvents in the incoming process gas, the exotherm of the solvents will be enough so that the destruction of VOC's will be self-sustaining and no auxiliary heat energy is required from the fuel source.

HEAT RECOVERY:

The high degree of heat recovery achieved is the result of regenerative heat transfer. The VOC laden process air enters a porous bed filled with high temperature ceramic heat transfer media. The air is preheated by bed #1 to a maximum temperature, passes through a central combustion chamber where the hydrocarbons are oxidized to carbon dioxide and water vapor, and then exits a second bed where heat is transferred from the hot air back into the bed. In order to avoid an uneven temperature distribution throughout the oxidizer, the gas flow direction is changed at regular intervals by the automatic valve-switching mechanism to maintain an even temperature profile between the twin beds.

ADWEST TECHNOLOGIES, INC.
RETOX® TWIN BED RTO OXIDIZER VALUE-ADDED BENEFITS

WIDE TWIN BED RTO DESIGN RANGE

- Skid mounted, shop assembled RETOX® twin bed RTO modular design
- Available in single module sizes from 600 Scfm up to 60,000 Scfm flowrates. Modules can be ducted in parallel to accommodate larger process flows of 100,000 Scfm+ flowrates
- Fully prewired, pretested automatic PLC controls
- Cost effective RETOX® RTO units allow you to meet and/or exceed EPA pollution control standards without a large capital investment

PROVEN ADWEST VOC/ODOR DESTRUCTION

- Over 400 Adwest/Airex oxidizer systems installed, including 125 on a Turnkey basis worldwide since 1987
- Installation experience on systems over 100,000 Scfm
- Units can be designed to destroy over 99% of VOC's and odors with no NOx contribution from the heat source due to flameless operation
- Up to 1700°F design oxidation capability provides thorough VOC, odor and hydrocarbon destruction
- Quick actuation carbon steel poppet valves minimize leakage

HIGH PRIMARY HEAT RECOVERY WITH MINIMAL ENERGY INPUT

- Units are available up to 95% primary heat recovery effectiveness
- External burner for cold startup-typically 1 hour
- Units will operate fuel free at approximately 3% L.E.L. (420 ppmv) inlet loadings with 95% heat recovery
- Low pressure drops requirements due to engineered media bed

COMPACT SHOP ASSEMBLED TWIN BED DESIGN

- Unit size and cost are reduced as compared to conventional oxidizer designs requiring large combustion chambers and heat exchangers
- Smaller RETOX® RTO units are completely skid mounted/shop assembled. With shop assembly prior to site arrival, installation manpower, time and cost are reduced compared to systems that require extensive field assembly
- Internal high temperature insulation, heat transfer media, poppet valves, burner and piping train are all shop installed/inspected

AUTOMATIC PRETESTED CONTROLS W/FREE LIFETIME MODEM DIAGNOSTICS

- Standard shop simulation tested Allen Bradley programmable logic control (PLC) system for automatic, unattended system operation
- TEL-MAX telemetry system with remote diagnostics capabilities

SHIPMENT:

Shipment is estimated to be 6 weeks or 12-13 weeks after receipt of purchase order and release for purchase of long-lead items. Our shipment, however, is subject to confirmation at time of award of purchase order. Adwest Technologies, Inc. will work with you to coordinate the RETOX® oxidizer shipment schedule to meet your VOC control compliance schedule.

CONDITIONS OF SALE:

Notwithstanding any other paragraph contained in this entire proposal, our Conditions of Sale, Form GS-524, for the equipment shall be incorporated herein and shall be applicable. All quoted prices based on current costs are firm only if shipment is made within six-months from date of quotation.

POLICY OF CONTINUING QUALITY INNOVATION

In the interest of maintaining state of the art quality in our equipment, Adwest Technologies, Inc. reserves the right to revise these specifications and incorporate suggested changes to include the latest improvements in the equipment design vendor components and system hardware.

PROCEDURE AND INSURANCE REQUIREMENTS

Provisions must be made by Purchaser to ensure that condensation of the fumes and vapors does not occur on the ducting or heat transfer surfaces during the operation of this equipment. Should deposits of this nature take place, such that a potential of fire exists during running, upset or shutdown conditions, it will be necessary to install a fire extinguishing system to protect this equipment from damage. This system must be designed so that the extinguishing materials will not be allowed to enter the oxidizer, as damage to the equipment could result. These provisions are not included in this proposal.

The equipment selected will incorporate automatic features for protection and safety. However, while these features and their characteristics of operation afford a degree of safety, operation of the equipment is not to be considered free from all dangers and hazards inherent in the handling and firing of fuel. Proper operating techniques and maintenance procedures as specified in our manuals must be adhered to at all times.

Should the obtaining of FM approval require special equipment not covered in this specification (i.e. fire protection equipment, electrical interlocking of the oxidizer to the system), the cost of this equipment and obtaining of all permits or approvals required for installation and/or operation of this equipment is the responsibility of others.

ERECTION ASSISTANCE AND START-UP:

Any contract resulting from this proposal will require start-up assistance to validate our warranty. This will require a technical service representative to be present at the time of initial start-up and must give release of operation of the equipment in accordance with the Seller's operating and maintenance manual.

SAFETY INSPECTIONS AND TESTING

RTO's are dependable and will provide reliable service for many years. In fact, users often forget it's part of their process as they operate with little attention for long periods. However this is only possible with routine maintenance and the National Fire Protection Association states that "documented safety inspections and testing shall be performed at least annually". (NFPA 86 Standard for Ovens and Furnaces 1996 Edition 5-2.4.2). Airex will be able to give you this service by supplemental agreement. Please contact our office for further details.

DESIGN CRITERIA & GUARANTEE

Design Criteria

The design criteria is for your emissions as supplied by Nailite International.

	<u>DESIGN</u>
Process Volume, Scfm	27,000
Process Gas Inlet Temp., °F	80
Solvent Loading #/Hr.	122.5-367.5 Max
Solvent Composition	Acetone, Toluene, Xylene
Operating Cycle, Hrs/Yr.	4,320
Negative Pressure Upstream of oxidizer, ("w.c.)	2.0

The solvent composition tabulated above has been assumed to have a solvent heat of combustion of 12,000 BTU/# net.

Because of their corrosive nature, compounds containing sulfur or halogens may not be suitable for application in the oxidizer. Also, if low boiling hydrocarbons are present in the process stream such that the potential for condensation in the ductwork exists, these conditions should be reviewed by Adwest Technologies engineering.

PERFORMANCE GUARANTEE:

- 1.A We make the following Performance Guarantee: If all of the Performance Conditions are satisfied, then the Equipment will reduce the concentration of hydrocarbons measured at the discharge stack of the Equipment as compared to the concentration of hydrocarbons measured at the inlet of Equipment by an average of greater than 98% or down to 25 ppm as C₁ in the stack. The Performance Conditions are defined in this specification under the heading of "Design Criteria". The Equipment must be operated within design limits of 1500°F to 1700°F oxidation temperature.
- 1.B Nitrogen Oxides-We make the following NO_x Performance Guarantee: If all of the Performance Conditions are satisfied and the equipment is operated within design parameters as specified in the "Design Criteria" section, the equipment will perform such that the total concentration of NO_x as measured (i.e. uncorrected to 3% of oxygen) at the discharge stack will not exceed 5 PPMv. This guarantee is predicated upon an inlet NO_x concentration of 0 PPMv and no nitrogenated hydrocarbons in the process exhaust.
2. The only Performance Guarantee made is that which is expressly stated in Paragraph 1A and 1B above. All other performance data contained in this Proposal or this Agreement or elsewhere are estimates or are for purposes of illustration only, and are not guaranteed.
3. The Performance Tests for determining whether the Performance Guarantee is satisfied shall be ineffective unless first reviewed and approved by us. We shall have the right and opportunity to witness the Performance Tests. In any event, the Performance Tests shall consist of simultaneous measurements of hydrocarbon solvent loadings at the inlet and discharge stack, and methane, ethane or other natural gas injection hydrocarbon contribution shall be deducted from the measurements at the discharge stack. Performance Tests shall be at your expense, except as provided in Paragraph 4 below, and if the Performance Tests for any unit of Equipment are not completed before the expiration of the Test Limitation Period for that unit, which shall expire 12 months from date of shipment, then that unit of Equipment shall be deemed to have satisfied the Performance Guarantee, and we shall have no further obligation under this Performance Guarantee as to that unit.

4. If any unit of Equipment does not satisfy the Performance Guarantee as determined by the Performance Tests, then we shall, at our option, either:
 - (a) repair, replace, or modify such unit of Equipment until it satisfies the Performance Guarantee; or
 - (b) pay you as liquidated damages in full satisfaction of all your claims arising out of failure to meet the Performance Guarantee, an amount equal to all payments made to us on this contract. If we elect to repair, replace, or modify such unit of Equipment, then the subsequent Performance Tests shall be administered at our expense (unless the failure was not caused by such unit of Equipment) until the Performance Guarantee is satisfied, at which time we shall have no further obligations under this Performance Guarantee as to that unit, and if after such repair, replacement, or modification the unit of Equipment fails to satisfy the Performance Guarantee, then we shall pay you liquidated damages per Clause (b) above. The remedies and obligations set forth in this Performance Guarantee are your exclusive remedies and our exclusive obligations in the event of failure of the Equipment to satisfy the Performance Guarantee.

SYSTEM ENERGY CALCULATION:

These calculations are based on design process flow and solvent composition rates as provided by Nailite International.

	<u>RETOX® 27.0 RTO95</u>
1. Process Flow Rate, Scfm	27,000
2. Oxidizer Inlet Temp, °F	80
3. Oxidizer Outlet Temp., °F	229
4. Oxidation Temperature, °F	1,600
5. Solvent Composition Rate, #/Hr.	367.5
6. Heating Value of Solvent, Btu/#	12,000
7. Net Energy from Solvent, BTU/Hr	4,410,000
8. Energy Required, MMBTU/Hr	Zero
9. Energy Cost/Hr. @ \$5.00/MMBTU	Zero
10. Fan Horsepower	75
11. Fan Energy Usage, KW	56
12. Fan Energy Cost/Hr @ \$.06/KWH	\$3.36

NOTE: *The above tabulation is for comparison purposes only and does not include casing heat losses.*

Energy requirements for the oxidizer is based on propane gas operation (7,150 CFH required at 5 Psig for one hour cold start-up/high fire condition).

SCOPE OF SUPPLY:

Type: One (1) Model RETOX® 27.0 RTO95 regenerative oxidizer system with 95 percent thermal efficiency.

Weight: RETOX® 27.0 RTO95
 108,200 pounds

Dimensions: 35'8" long plus process fan
 22'6" wide
 12'2" high

EQUIPMENT INCLUDED:

- Heat transfer media
- Bed casing
- Inlet and outlet plenums
- Casing insulation
- Casing access opening
- Nozzle mix propane gas burner with FM propane gas pipe train and combustion air blower (15 H.P.)
- Propane gas injection system
- Two (2) process flow control valves with pneumatic operators
- System controls including Allen Bradley (SLC) 500 programmable logic controller with an SLC 5/03 processor
- TEL-MAX telemetry system with remote diagnostics capability
- High temperature paint
- Four installation, operation, and maintenance instruction manuals
- Skid-mounted and prewired
- Process fan, motor and optional AC drive
- Compressed air surge tank with controls
- Integral support skid
- Exhaust stack (30') (44" diameter)
- Fan to oxidizer transition

DESCRIPTION OF EQUIPMENT:

Heat Transfer Media-95% Heat Recovery

The high temperature heat transfer media supplied will consist of a silica/alumina media, sized and selected to provide the most efficient heat recovery and pressure drops for this application. When shipping limits permit, the heat transfer media will be factory installed to reduce hours for field installation of the unit.

Bed Casing 3/16" Plate

The bed casing design consists of all-welded construction, externally stiffened to withstand the pressure requirements of the forced draft fan and the lateral loads from the heat transfer surface making up the beds.

Inlet and Outlet Plenums 3/16" Plate

The inlet and out plenums are designed to provide the most efficient flow distribution into and out of the porous bed and are constructed from externally stiffened carbon steel plates. The plenum walls do not require insulation for the LEL levels specified for this application.

Bed Casing Insulation

The bed casings are internally insulated with 6-8 inches of ceramic fiber insulation (Carborundum or equal) rated at 2300°F which is factory installed.

Casing Access Openings

The ceiling structure of the upper plenum is constructed such that access to the heat transfer media and burner is available to perform routine inspections.

Burner Assembly

The burner is a nozzle mix style by Maxon or equal and is utilized only for unit start-up. An FM designed natural gas piping train is also provided.

Propane Gas Injection System

A propane gas injection system is utilized to allow the RETOX® to be operated without the use of the main burner. This eliminates the need for combustion air and reduces the fuel consumption by up to 60 percent.

Heat Exchanger Bypass (Not required)

In the event of high VOC concentrations, the heat exchanger bypass damper will modulate open to dump the excess heat. The damper consists of a refractory cast lined body with an alloy steel shaft and blade.

Bake-Out (Not required)

The oxidizer control logic can include an off-line bake-out mode feature. This feature will allow the cold ends of the heat exchanger bed media to be elevated to a temperature of 600°F-700°F for the purpose of volatilizing (i.e. baking-out) any residual condensed hydrocarbons.

Two (2) Process Flow Control Valves

The oxidizer module contains two (2) control valves used to switch the direction of the process stream through the oxidizer. The valves are operated by two pneumatic actuators and are fabricated from carbon steel. Clean, dry compressed air at 360 CFH and 90 psig is required. If the air is not dry, freeze protection may be required and is not included.

System Controls and Instrumentation

The control panel is prewired, labeled, shop simulation tested, complete and ready for connections to plant power source. The panel will be designed to NEMA 4 standards and suitable for outdoor installation. The panel is 36"W X 42"H X 12"D and will contain the following:

Door mounted items include the following components:

- Selection switches for mode of operation
- Quartech data readout panel
 1. Text display of unit status, alarms and maintenance prompts.
 2. Selection push buttons for process blower, burner/start/stop and maintenance reset.
- Fault push-button

Internal mounted items include the following components:

- Main incoming 460v fused disconnect, 3-phase
- Honeywell flame safeguard
- Honeywell Burner management system
- Combustion air motor starter/disconnect
- Allen-Bradley SLC 500 with an SLC 5/03 processor having telemetry capabilities
- Strip chart recorder (one pen)

Other items include flow diversion valves with solenoids, hand valve, filter, and regulator, for the compressed air piping train. Also included is a low compressed air pressure switch, proof of air flow differential pressure switch, high temperature limit switch mounted in the exhaust, and miscellaneous thermocouples. Controls of thermal oxidizer shall be based on Adwest's standard design, programming and P & ID philosophy.

The Allen Bradley computer is supplied with a telemetry system which allows the Adwest/Airex service department to remotely monitor the system operation. A telephone line to the control panel is required to enable Adwest/Airex personnel to communicate and remotely make program changes if required during start-up or future trouble shooting. Software is optional to allow the customer to remotely monitor the system. Software cost is \$1,950.

Fan, Motor and Drive

The oxidizer is equipped with a heavy duty, forced draft Industrial Blower (New York Blower or equal). The fan includes a drive motor and guards. The drive motor is a 100 horsepower operating at 1800 RPM with a 460 volt, three-phase, 60 Hertz power supply. Blower performance is outlined below:

Performance

Maximum Conditions:

RETOX® 27.0 RTO95

1. 27,000 Scfm @ 70°F
2. 17" w.c. total
(-2.0" w.c. @ fan inlet)
3. 98 BHP @ 80°F

Process Fan to Unit Ductwork

The process fan inlet duct is fabricated from carbon steel. The duct is supplied with a predrilled flange for ease of connecting to the ductwork. External insulation of process fan and fan to unit ductwork is by others if required.

Paint

All exposed surfaces of the oxidizer will be coated with two (2) coats of our standard high temperature paint (black, brown, silver, and gray). The stack will be manufactured from carbon steel.

Installation, Operation and Maintenance Instruction Manuals

The Adwest Technologies Technical Services Department will furnish four (4) complete sets of operation and maintenance instruction manuals.

Purchaser to Supply

The following equipment and services are ***not included in our equipment only pricing and are to be furnished by others:***

- a. Air Quality compliance testing.
- b. Provisions for obtaining FM or IRI or OSHA approval.
- c. Purchaser to perform all testing required to verify the accuracy of the Purchaser design parameters used in selecting the proposed equipment.
- d. All required construction, EPA, operator permits and associated costs
- e. Sales tax on project.
- f. UL Approval if required.
- g. Utilities brought to oxidizer location.
- h. Process ductwork.
- i. Our steel supply is designed for our equipment loadings only. No external loads are to be applied. Please contact Adwest Technologies engineering if additional loads are to be accommodated.
- j. Foundations and soil analysis.
- k. Personnel protection, security fencing and lighting.
- l. Starter/disconnect if AC Drive is not purchased.
- m. Freight.
- n. Startup and training.
- o. All mechanical and electrical installation.
- p. All electrical power disconnects.

TURNKEY ERECTION SPECIFICATION

FOR

NAILITE INTERNATIONAL MIAMI, FLORIDA

A. To Be Furnished By Adwest Technologies, Inc.

The Adwest scope of installation and service will include the following:

- A.1 Mechanical and electrical erection of one (1) RETOX® 27.0 RTO95 regenerative oxidizer system, ground-mounted at your plant in Miami, Florida, including filling of heat exchanger media, forced draft oxidizer fan with motor, controls, stack, start-up, training, freight, rigging, and engineering.
- A.2 Electrical installation of main control panel at the oxidizer unit, thermocouples, actuators and optional NEMA 12 AC drive for process air blower. (within 20 feet of unit).
- A.3 Connection of utilities (electrical power, natural gas, compressed air and telephone line), located by others to the oxidizer location. (within 10 feet of the unit).

B. Services

- B.1 Services of an Adwest Technologies field serviceman.
- B.2 Erection management services to integrate activities of Adwest for the successful and timely completion of the project.
- B.3 Non-union labor, tools and material necessary to unload, store, position and install equipment supplied by Adwest Technologies, Inc.
- B.4 All work is based on standard weekday labor and does not include premium time utilized to expedite the installation.
- B.5 Inspection of all equipment as it arrives on the jobsite with respect to shipping damage and completeness of shipments in accordance with the bill-of-lading.
- B.6 Non-union labor, equipment and material necessary to touch-up marked areas on equipment.
- B.7 Training of operating personnel, not to exceed one day.

C. To Be Furnished by Purchaser

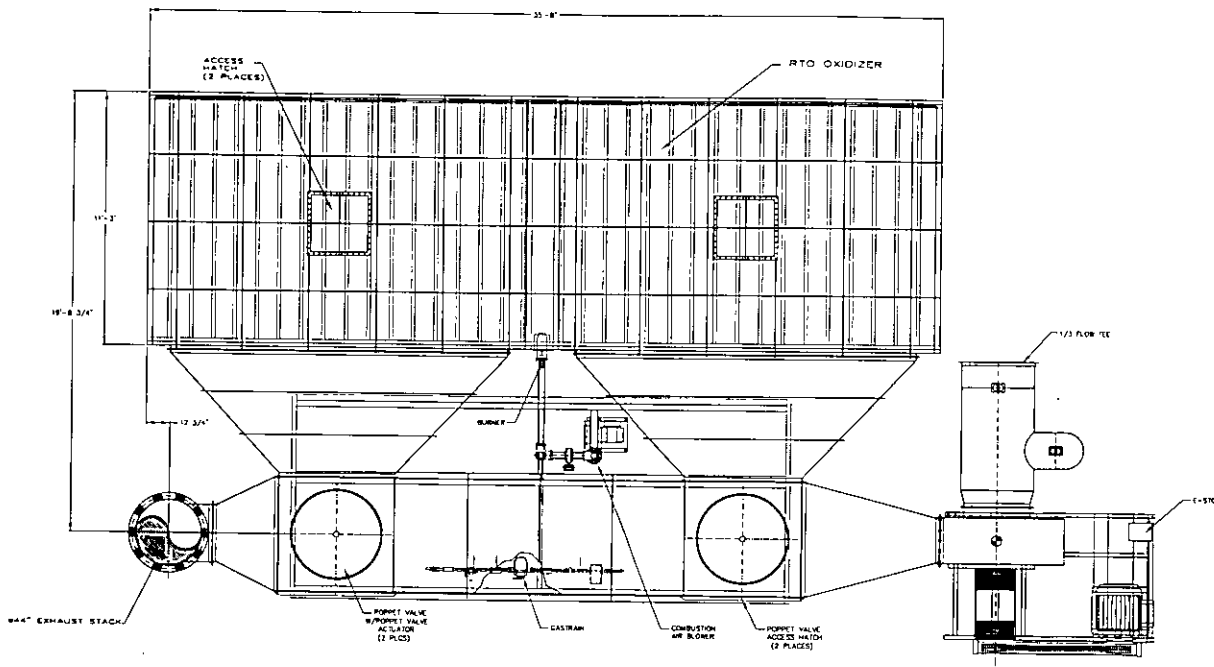
The following equipment and services are *not included in the Turnkey portion and are to be furnished by others:*

- C.1 Lighting and convenience outlets.
- C.2 Free and unobstructed access to the work site, including maintained storage areas and roadways. Ground conditions shall be suitable for heavy equipment operation.
- C.3 Power supply of 460 volt, 60 cycle, three-phase and 120v, 60 cycle, single phase.
- C.4 Facilities for erection supervision, equipment staging and storage.
- C.5 Natural gas at 5 Psig and clean dry compressed air at 90 Psig. (Please advise Adwest if 5 psig is not available).
- C.6 All city, county and EPA permits.
- C.7 UL approval if required.
- C.8 Sales Tax and duties.
- C.9 Air Board Compliance testing.
- C.10 All utilities brought to the oxidizer location.
- C.11 Process ductwork. (Adwest will quote after jobwalk).
- C.12 All electrical power disconnects.
- C.13 Concrete foundations and/or support steel for elevated installations.
- C.14 All other items and services not specifically included by Adwest scope of supply.

D. Commissioning

- D.1 Plant operating and start-up personnel to ensure successful operation of the equipment.
- D.2 Adwest/Airex start-up personnel to conduct classroom and equipment training sessions with customer operating personnel.

REVISIONS				
NO.	DATE	DESCRIPTION	BY	APPROVED
1		PROPOSAL DRAWING		

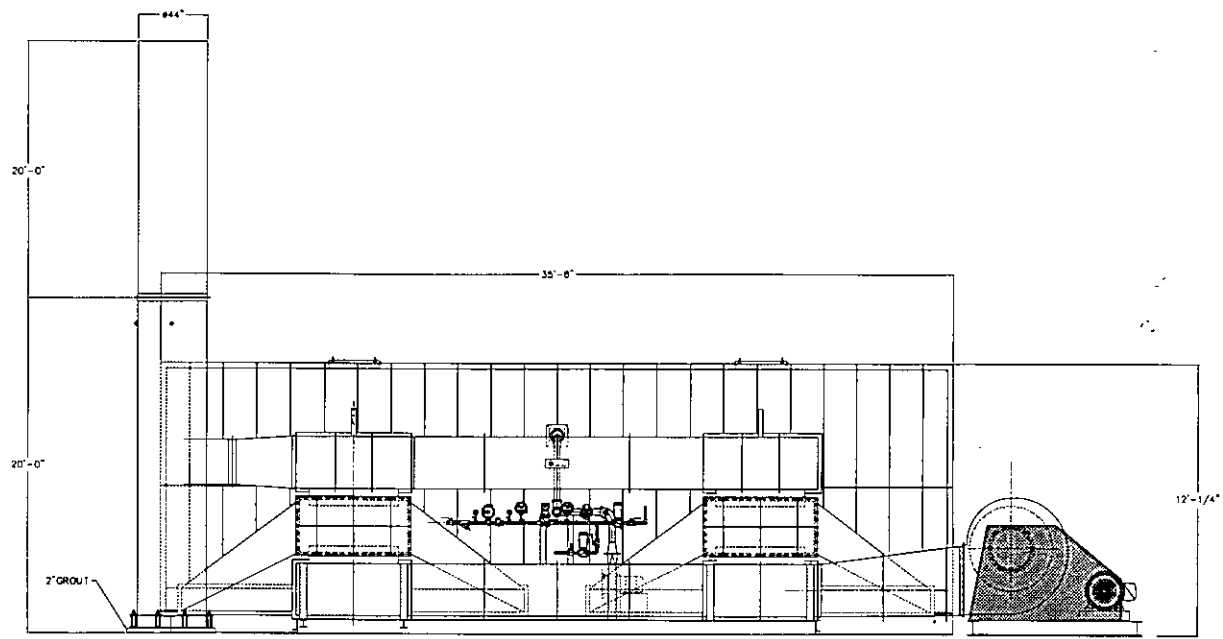


PROPOSAL DRAWING ONLY NOT FOR CONSTRUCTION

- NOTES:
- 1) THE WEIGHT OF THE MAIN OXIDIZER SKID W/MEDIA = 85,883 LBS
THE MAX. LOAD = 27.8 PSI
 - 2) THE WEIGHT OF THE POPPET VALVE SKID = 12,467 LBS
THE MAX. LOAD = 3.8 PSI
 - 3) THE WEIGHT OF THE 40" EXHAUST STACK = 3,328 LBS
THE MAX. CONCENTRATED BEARING STRESS OF THE EXTERIOR EDGE OF THE BASE RING = 370 PSI
 - 4) THE WEIGHT OF THE PROCESS FAN = 5,085 LBS


	NAILITE INTERNATIONAL MIAMI, FL	
	270 RTO-95 REGENERATIVE THERMAL OXIDIZER UNIT	
GENERAL ARRANGEMENT		
DATE: 04 MAR 00 BY: [Signature]	SHEET NO: 01 OF 01	PROJECT NO: 02-01 DRAWING NO: 01 OF 3

REVISIONS			
NO.	DATE	DESCRIPTION	APPROVED

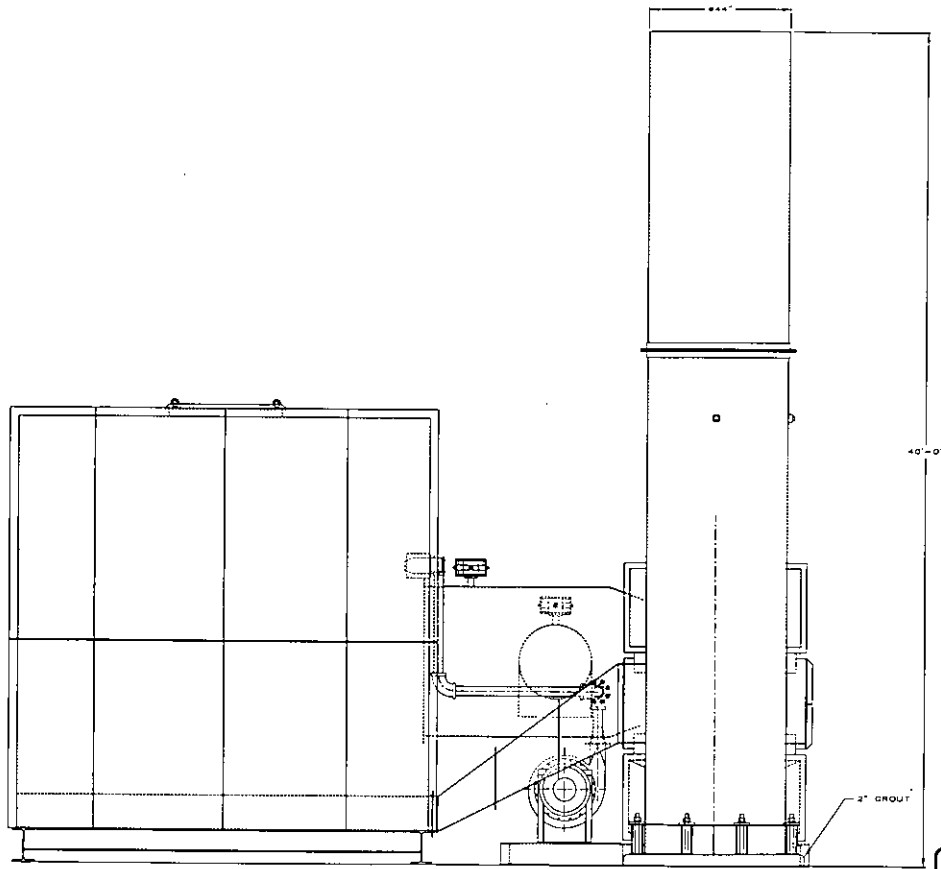


SIDE ELEVATION

PROPOSAL DRAWING ONLY NOT FOR CONSTRUCTION


	NAILITE INTERNATIONAL MIAMI, FL 270 RTD-95 REGENERATIVE THERMAL Oxidizer Unit	
	GENERAL ARRANGEMENT	
UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES	DATE 24 MAR '00	DRAWN BY T.S.
PROJECT NO. 270 RTD-95	SHEET NO. 02-01	APPROVED BY C. NORTH
TOTAL SHEETS 2 OF 3		SHEET NO. 2 OF 3

REVISIONS			
NO.	DESCRIPTION	DATE	APPROVED
1	PROPOSAL DRAWING	24 MAR 00	

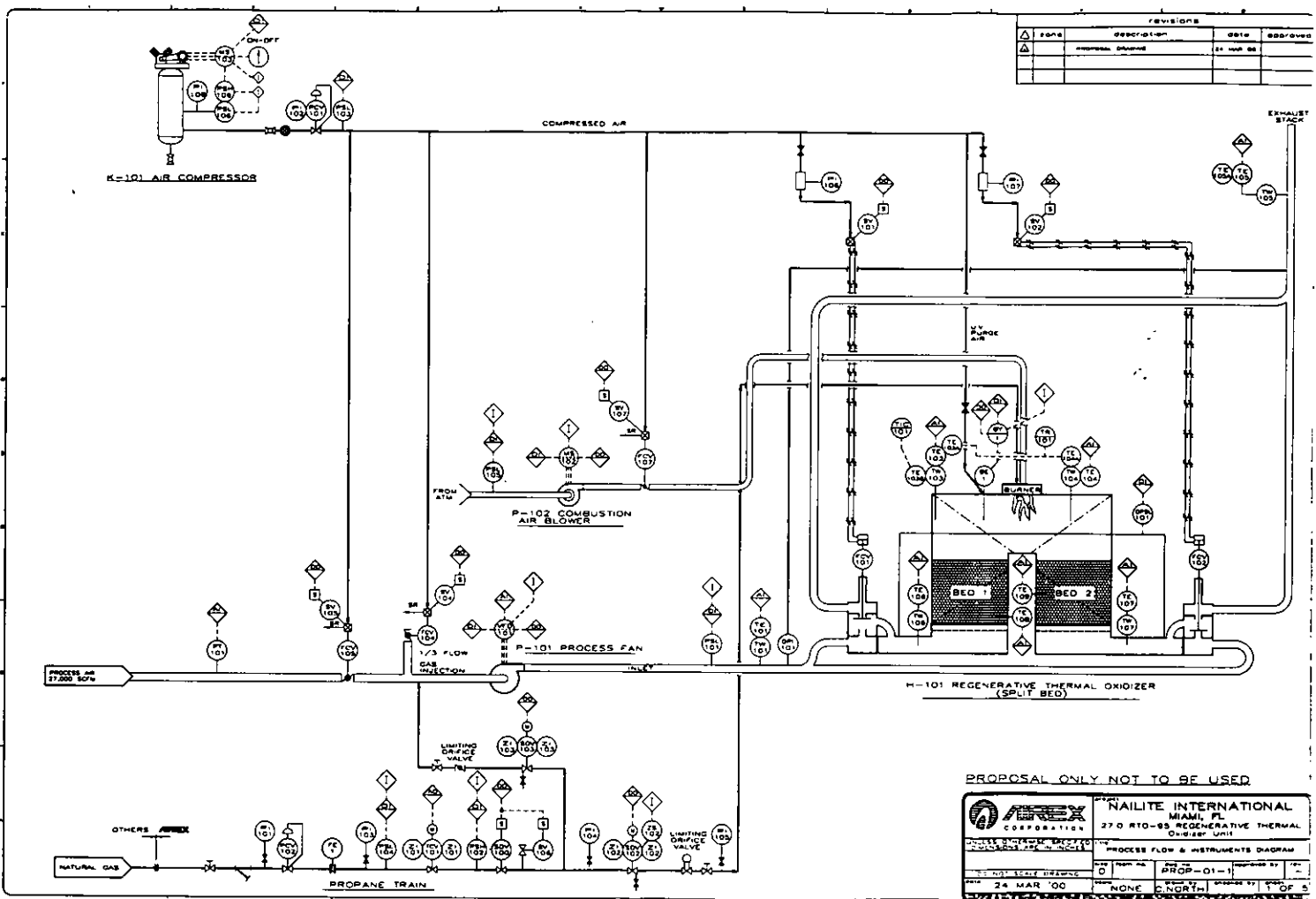


END VIEW

PROPOSAL DRAWING ONLY NOT FOR CONSTRUCTION

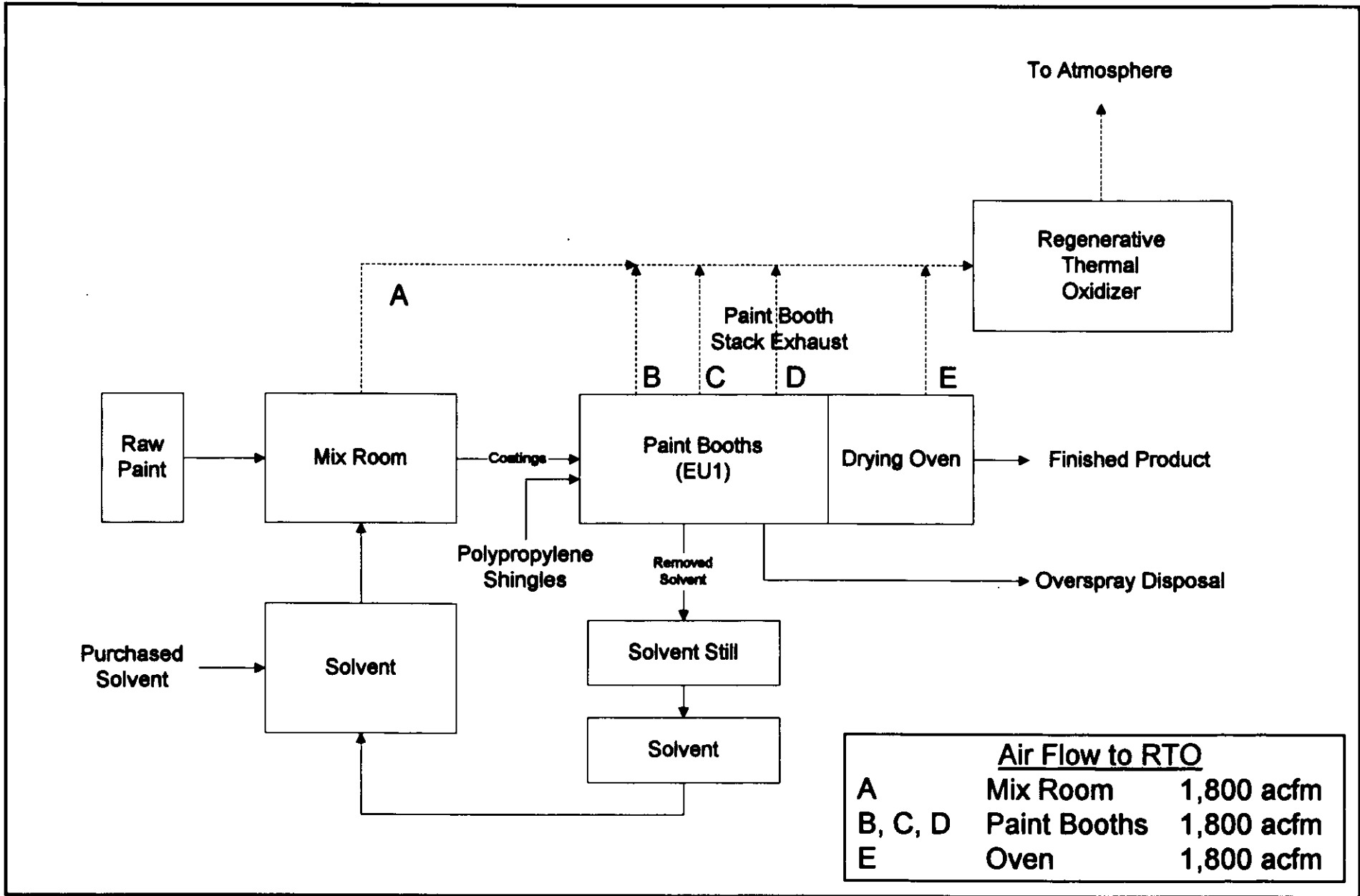
	NAILITE INTERNATIONAL MIAMI, FL 270 RTD-95 REGENERATIVE THERMAL CRACKER UNIT		
	GENERAL ARRANGEMENT		
DATE: 24 MAR 00 DRAWN BY: [] CHECKED BY: [] PROJECT: []	SHEET NO: [] TOTAL SHEETS: []	SCALE: [] NORTH: []	JOB NO: [] DRAWING NO: []

REVISIONS			
NO.	DESCRIPTION	DATE	BY
1	ISSUED	01 MAR 00	SS
2	REVISED	24 MAR 00	SS



PROPOSAL ONLY NOT TO BE USED

	NAILITE INTERNATIONAL MIAMI, FL 270 RTD-88 REGENERATIVE THERMAL OXIDIZER UNIT		
	PROCESS FLOW & INSTRUMENTS DIAGRAM		
24 MAR 00	NONE	NORTH	1 OF 5



Attachment NI-FI-E3
 Process Flow Diagram of the New
 Panel Finishing Spray Line
 Nailite International, Inc.

Process Flow Legend
 Solid/Liquid \longrightarrow
 Gas $\cdots\cdots\longrightarrow$

Filename: 0037523Y/F1/WP/FLOW.VSD (NI-FI-E3)
 Date: 05/09/00



Nailite International, Inc.**COST EFFECTIVENESS OF THE VOC CONTROL SYSTEM**

Capital Cost of Transfer Technology for Paint Line	\$ 225,600
RTO Installed Capital Cost	\$ 451, 145
Total capital cost	\$ 676,745
Annualized Capital Cost (7% @ 10 yrs) (TCC x 0.1424)	\$ 96,400
Yearly Operation Cost	<u>\$ 13,230</u>
Total	\$ 109,600

Maximum uncontrolled VOC Emissions from New Paint Line	900 tons
Maximum controlled VOC emissions from New Paint Line	130 tons
Total VOC Destruction	770 tons
VOC Cost Effectiveness	\$ 142/ton VOC



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 4, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David G. Steedman
Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

Re: DEP File No. 0250407-003-AC (PSD-FL-289)
New Panel Line

Dear Mr. Steedman:

The Bureau of Air Regulation reviewed the referenced application received on April 17 and found that additional information is required. The completeness items are listed below.

1. Identify the specific chemical compounds comprising the VOCs (28% of total vapor emissions) that will be emitted in addition to the toluene and xylene emissions specified (78% of total VOCs). (Rule 62-212.400, F.A.C.).
2. Show emission calculations for the existing equipment after it is relocated to the new building following startup of the new line. (Rule 62-212.400, F.A.C.).
3. The application states that since "MACT exceeds BACT by definition" and that "MACT is more stringent than BACT", "MACT will be considered as satisfying BACT requirements." To the contrary, there are cases where BACT can be considerably more stringent than MACT (e.g., fluoride limits for the phosphate industry). In the absence of a separate case-by-case MACT Determination, please change the language at the end of Section 3.1.2 (page 3-4) of the application as indicated below:
 - *"~~MACT BACT is more stringent than~~ equivalent to BACT MACT in this instance. Therefore, for the purposes of this application, MACT BACT will be considered as satisfying BACT MACT requirements."*
- (Rule 62-204.800(10)(d)2., F.A.C.).
4. Submit a diagram or picture of the internals of the specific RTO proposed along with the manufacturer's equipment description and range of performance specifications and indicate if a concentrator will be utilized. Provide a diagram showing air circulation/ventilation rates for the building and process equipment and show calculations for the estimated cost effectiveness of the control device. (Rule 62-212.400, F.A.C.)

Mr. David G. Steedman
Page 2 of 2
May 4, 2000

If there are any questions regarding the above, please call John Reynolds at 850/921-9536.

Sincerely,

Handwritten signature of A. A. Linero in cursive, followed by the date 5/4.

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

AAL/JR

cc: Gregg Worley, EPA
John Bunyak, NPS
Isidore Goldman, SED
Patrick Wong, DCDERM
Benny Susi, Golder Assoc.

Z 341 355 280

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
David Steedman	
Street & Number	
Nailite Int'l	
Post Office, State, & ZIP Code	
Miami FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 5
Postmark or Date	5-20
0350407-003-AC	
PSD-FL-289	

PS Form 3800, April 1995

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:
 David G. Steedman
 Vice President of Operations
 Nailite Int'l
 1111 NW 165th St.
 Miami, FL 33169

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)	B. Date of Delivery
C. Signature X [Signature]	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No

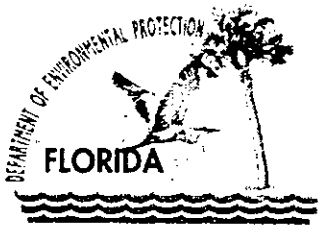
3. Service Type

<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)

Z 341 355 280



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

April 19, 2000

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA – Region IV
61 Forsyth Street
Atlanta, Georgia 30303

Re: Nailite International, Inc.
New Panel Finishing Spray Line
0250407-003-AC, PSD-FL-289

Dear Mr. Worley:

Enclosed for your review and comment is an application for the above mentioned project.

Your comments can be forwarded to my attention at the letterhead address or faxed to me at (850)922-6979. If you have any questions, please contact John Reynolds at (850)921-9536.

Sincerely,

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

AAL/kt

Enclosures

cc: J. Reynolds, BAR



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

April 19, 2000

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS-Air Quality Division
Post Office Box 25287
Denver, CO 80225

Re: Nailite International, Inc.
New Panel Finishing Spray Line
0250407-003-AC, PSD-FL-289

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for the above mentioned project.

Your comments can be forwarded to my attention at the letterhead address or faxed to the Bureau at (850)922-6979. If you have any questions, please contact John Reynolds at (850)921-9536.

Sincerely,

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

AAL/kt

Enclosures

cc: J. Reynolds, BAR