

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

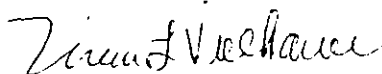
Mr. John Perry, VP Operations  
Nailite International, Inc.  
1111 NW 165<sup>th</sup> Street  
Miami, Florida 33169

DEP File No. 0250407-005-AC  
Permit No.: PSD-FL-289A  
Dade County

Enclosed is the Final Air Construction Permit (0250407-005-AC) to install a new plastic panel spray line, relocate the existing panel spray line, and convert the existing line to a direct pigment injection process at the above facility located at 1111 NW 165<sup>th</sup> Street in Miami. This permit replaces the previously issued Air Construction Permit (0250407-003-AC) for the same project. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT was sent by certified mail\* and copies were mailed by U.S. Mail before the close of business on 12/31/02 to the person(s) listed:

John Perry, NII\*  
Jim Little, EPA  
Tom Tittle, DEP SED  
Mallika Muthiah, Miami-Dade DERM  
Victor Rossinsky, CRB

Clerk Stamp

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

Victoria Gibson / December 31, 2002  
(Clerk) (Date)

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Perry  
 V.P., Operations  
 Nailite International, Inc.  
 1111 NW 165th Street  
 Miami, FL 33169

**COMPLETE THIS SECTION ON DELIVERY**

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

And Ortega 1-6-92

C. Signature

X And Ortega

Agent

Addressee

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C.O.D.

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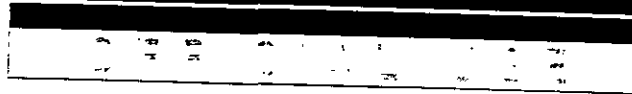
PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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 Street, Apt., P.O., or PO Box 1111 NW 165th St.  
 City, State MIAMI, FL 33169

PS Form 3811, January 2001

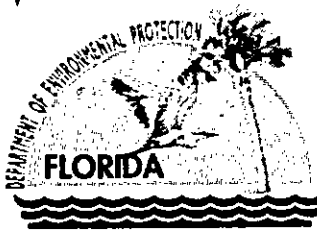
See Reverse for Instructions

FINAL DETERMINATION  
NAILITE INTERNATIONAL, INC.  
New Panel Spray Line  
And Relocation of Existing Line  
Permit No. 0250407-005-AC

An Intent to Issue a Revised Air Construction Permit to Nailite International, Inc. for the installation of a new panel spray line and the relocation of the existing line at the applicant's facility located at 1111 N.W. 165<sup>th</sup> Street, Miami, Dade County, Florida was distributed on December 12, 2002. The permit revises certain conditions in the original construction permit (0250407-003-AC/PSD-FL-289) issued on September 26, 2000. The original construction permit authorized the applicant to construct a new plastic panel spray coating line (No. 2 Line) and relocate the old No. 1 spray line from its former location to be connected with the air pollution control system installed for the new line. This revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules but leaves its Maximum Achievable Control Technology (MACT) applicability unchanged under the Department's National Emissions Standards for Hazardous Air Pollutants (NESHAP) rules. Under this revision, the PSD applicability threshold of 250 tons per year for the entire facility will not be exceeded, while the MACT applicability threshold of 10 tons per year of a single hazardous air pollutant (HAP) or 25 tons per year of total HAPs will be exceeded. This permit revision also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be shut down permanently. The maximum production capacity of 300,000 gallons of paints and solvents per line per year shall remain the same as in the original permit.

The Public Notice of Intent to Issue Air Construction Permit was published in the Miami Herald on December 16, 2002. Copies of the draft construction permit and related documents were available for public inspection at the Department's offices in Tallahassee and West Palm Beach and at the Miami-Dade County Department of Environmental Resources Management (DERM) in Miami. No comments were received during the public comment period.

The final action of the Department will be to issue the permit as proposed.



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

## PERMITTEE

Nailite International, Inc.  
1111 N.W. 165<sup>th</sup> Street  
Miami, Florida 33169

Permit No.: 0250407-005-AC  
Project: New Panel Spray Line and  
Relocation of Existing Line  
Expires: December 31, 2003  
Location: Miami-Dade County

## AUTHORIZED REPRESENTATIVE:

Mr. John Perry, Vice President of Operations

## PROJECT AND LOCATION

This permit revises certain conditions in the original construction permit (PSD-FL-289) issued on September 26, 2000 and incorporated into the existing Title V permit. The original construction permit authorized the applicant to construct a new plastics panel spray coating line (No. 2 Line) and relocate the old No. 1 spray line from its former location to be connected with the air pollution control system installed for the new line. This revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules but leaves its Maximum Achievable Control Technology (MACT) applicability unchanged under the Department's National Emissions Standards for Hazardous Air Pollutants (NESHAP) rules. Under this revision, the PSD applicability threshold of 250 tons per year for the entire facility will not be exceeded, while the MACT applicability threshold of 10 tons per year of a single hazardous air pollutant (HAP) or 25 tons per year of total HAPs will be exceeded. This permit revision also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be permanently shut down. The maximum production capacity of 300,000 gallons of paints and solvents per line per year shall remain the same as in the original permit. Any increase above 300,000 gallons per line per year will require a modification of this permit per Rule 62-4.080 and Chapters 62-210 and 62-212 of the Florida Administrative Code. The SIC code for this facility is 3089.

The project is located at 1111 N.W. 165th Street, Miami, Dade County. The UTM coordinates are Zone 17; 578.4 km E; 2867.2 km N. The Everglades National Park is approximately 35 km west-southwest of the site.

## STATEMENT OF BASIS

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

## APPENDICES

The attached appendices are a part of this permit.

Appendix BD Revised BACT/MACT Determination  
Appendix GC General Permit Conditions

Howard L. Rhodes, Director  
Division of Air Resources  
Management

"More Protection, Less Process"

Printed on recycled paper.

**AIR CONSTRUCTION PERMIT  
SECTION I. FACILITY INFORMATION**

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**FACILITY DESCRIPTION**

Nailite manufactures and coats plastic shingles molded from polypropylene pellets. The former Nailite facility, consisting of Line No. 1 (EU-001), was located at 1251 NW 165th Street in Miami, Dade County. The new plastic panel spray line (Line No. 2 or EU-002) is located at 1111 NW 165th Street, approximately 500 feet east of the former facility. Under the former construction permit (PSD-FL-289 issued on September 26, 2000), Line No. 1 was relocated to the new address to be operated alongside the new Line No. 2. The No. 1 Line consists of three paint spray booths and eight injection-molding machines. The new No. 2 Line consists of three continuous spray booths and a curing oven. Air pollution controls consist of a state-of-the-art Regenerative Thermal Oxidizer (RTO) for controlling VOC/HAP emissions.

The facility consists of the following emissions units.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	No. 1 Line consisting of 3 Paint Spray Booths
002	Injection Molding Machines
003	Storage Tanks
004	No. 2 Line (3 Continuous Spray Booths and a Curing Oven)

**REGULATORY RECLASSIFICATION**

The facility, consisting of the above emissions units, is reclassified as a synthetic minor facility regarding the Department's PSD rules because controlled emissions of volatile organic compounds (VOC) will not exceed 250 tons per year (TPY). This facility is not within an industry included in the list of 28 Major Facility Categories per Table 62-212.400-1, F.A.C., therefore, the major source threshold of 250 TPY must be reached before PSD applies. However, because emissions of at least one hazardous air pollutant (HAP) exceed 10 tons per year and emissions of total HAPs exceed 25 tons per year, this facility is a major source of HAPs and thus is a major Title V HAP source.

**REVIEWING AND PROCESS SCHEDULE**

11-20-02	Date of Receipt of Application
11-20-02	Date Application Complete
12-16-02	Notice of Intent Published in Newspaper

**RELEVANT DOCUMENTS**

The documents listed below constitute the basis for the permit and are on file with the Department.

- Permit Application
- Revised Determinations of Best Available Control Technology (BACT) and Maximum Achievable Control Technology (MACT)
- Department's Intent to Issue

**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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The following specific conditions apply to all emissions units at this facility addressed by this permit.

**ADMINISTRATIVE**

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Air Division of the Dade County Department of Environmental Resources Management (DERM), Suite 900, 33 Southwest Second Avenue, Miami, Florida 33130-1540 (phone number: 305/372-6925). All applications for permits to construct or modify an emission unit subject to Prevention of Significant Deterioration or Nonattainment (NA) Review requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).

2. General Conditions: The permittee is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]

3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Expiration: This air construction permit shall expire on December 31, 2003. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]

7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V

**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for and receive a Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's appropriate District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

**GENERAL EMISSIONS LIMITING STANDARDS**

9. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]

10. Unconfined Emissions of Particulate Matter: [Rules 62-296.320(4)(c) and 62-212.400, F.A.C.]

(a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

(b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.

(c) Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

(d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]

(a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

(b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. (Not federally enforceable)

**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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[Note: An objectionable odor is defined in Rule 62-210.200(203), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.]

### **OPERATIONAL REQUIREMENTS**

12. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department's appropriate district office and the appropriate local program office. The notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]

13. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

14. Excess Emissions:

For purposes of this permit, all limits established pursuant to the State Implementation Plan, including those limits established as BACT, include emissions during periods of startup and shutdown, and are not subject to the provisions of Rule 62-210.700(1), F.A.C. This provision cannot be used to vary any NESHAP requirements from any subpart of 40 CFR 63. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown or malfunction shall be prohibited pursuant to Rule 62-210.700(4), F.A.C. [Rules 62-4.070(3) and 62-210.700(5), F.A.C.]

Excess emissions resulting from malfunction of any emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

### **COMPLIANCE MONITORING AND TESTING REQUIREMENTS**

15. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]



**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

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16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

18. Test Procedures shall meet all applicable requirements of Rule 62-297.310(4), F.A.C. [Rule 62-297.310(4), F.A.C.]

19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]

21. Test Notification: The permittee shall notify the appropriate Department District Office and the appropriate local program at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]

22. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

## REPORTING AND RECORD KEEPING REQUIREMENTS

23. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]

24. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]

25. Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the appropriate Department District Office and the appropriate local program within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the NESHAP requirements, excess emissions shall also be reported in accordance with 40 CFR 63, Subpart A. [Rule 62-4.130, F.A.C.]

26. Excess Emissions Report - Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the appropriate Department District Office and the appropriate local program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rule 62-210.700(6), F.A.C.]

27. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the appropriate department District Office and the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

The following specific conditions apply to the following emissions units:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	No. 1 Spray Coating Line (3 Paint Spray Booths and a Solvent Recovery Still)
002	Injection Molding Machines and associated Hydraulic Tanks
003	Storage Tanks
004	No. 2 Line (3 continuous Spray Booths and a Curing Oven)

[Note: This facility is subject to MACT for HAP as indicated in the Revised BACT/MACT Determination attached as part of this permit. All emissions units are subject to the requirements of the state rules as indicated in this permit.]

1. This permit supersedes the applicable conditions of the existing air operation permit for the facility. Emissions Units 001, 002, 003 and 004 may each operate for up to 8,760 hours/year. The facility is required to keep daily records of the operating hours. [Rules 62-210.200, Definitions-Potential to Emit (PTE) and 62-213.440(1)(b)1.b., F.A.C.]

2. The maximum amount of coating applied shall be 300,000 gallons per line per year. The No. 1 Spray Coating Line (EU-001) shall be allowed to operate through December 31, 2003, and not thereafter. EU-001 shall only operate while appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that its emissions are controlled along with those from Emissions Unit 004. Total hourly and annual emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the RTO shall be established within 45 days of receipt of the emission test results required in Specific Conditions Nos. 3 and 4 below. [Rules 62-4.070(3), 62-204.800(10)(d)2., and 62-210.200 (PTE), F.A.C., and MACT]

3. The air pollution control system shall consist of a Regenerative Thermal Oxidizer (RTO) as specified in the application and subsequent documents submitted in support thereof. The VOC/HAP capture and treatment system for EU-004 shall be designed to capture at least 95 percent of the total VOC/HAP emissions generated from the panel spraying operation while destroying at least 95 percent (90 percent overall capture and destruction). Appropriate emission limits and capture and destruction efficiencies for the air pollution control system shall be established by the Department within 45 days following receipt of the capture and destruction efficiency test results required by Specific Condition 4 below and shall be incorporated into the Title V permit for this facility. [Rule 62-4.070(3) F.A.C.]

4. Pursuant to the requirements of Specific Condition 3 above, the permittee shall demonstrate the RTO destruction efficiency while both EU-001 and EU-004 are operating simultaneously at permitted capacity. The individual VOC/HAP capture efficiencies of EU-001 and EU-004 shall be established by comparing raw VOC/HAP emissions generated during each of three separate one-hour test periods (based on material usage rates and appropriate emission factors) with captured emissions based on measured flow rates and VOC/HAP concentrations in the RTO inlet duct as determined by EPA Methods 2 and 18, 25 or 25A, described in 40 CFR 60 Appendix A. Depending on the test results, the Department may require a monitoring system for verifying that capture efficiencies are always maintained above a predetermined minimum level for reasonable assurance of adequate capture. A destruction efficiency test shall be performed annually on the RTO. Within 45 days following test completion, results of the above tests shall be submitted along with a complete test report to the Bureau of Air Regulation in Tallahassee, the Department's Southeast District and the Miami-Dade County Environmental Resources Management Department. [Rule 62-4.070(3) F.A.C.]

**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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5. Testing of emissions shall be conducted annually with the emissions units operating at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emissions units may be tested at less than 90% of the maximum operating rate allowed by the permit; in this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the emissions unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C., 40 CFR 60 Appendix A and 40 CFR 60.8, Subpart A].

6. The permittee shall continuously keep and maintain a five-year ongoing compilation of the following records to demonstrate compliance with the VOC/HAP emissions limitations of Specific Condition No. 2 of this section. Records shall be completed no later than five working days after the end of each month.

- Amounts in pounds of each material used each month that contains VOC/HAP.
- Weight percentage of VOC/HAP in materials using the highest value listed on the Manufacturer's Safety Data Sheets.
- Amount in pounds of VOC/HAP emitted each month from each material used during the month, calculated by multiplying the amount of each material used by its VOC/HAP content and then by the appropriate emission factor.
- Total amount in pounds of VOC/HAP emitted each month, calculated as the sum of VOC/HAP emitted from each material used during the month as determined above.
- Rolling 12-month total amount in pounds and tons of VOC/HAP emitted in the most recent consecutive 12-month period, calculated as the sum of VOC/HAP emitted for the current month and the preceding eleven months.

[Rule 62-4.070(3), F.A.C.]

7. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

8. The above emissions units shall be subject to the following:

- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700, F.A.C.]
- Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700, F.A.C.]
- Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700, F.A.C.]
- In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700, F.A.C.]

9. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(5) to the Department's Southeast District Office and the Miami-Dade County Environmental Resources Management Department by March 1 of the following year for the previous year's operation. [Rule 62-210.370, F.A.C.]

**AIR CONSTRUCTION PERMIT 0250407-005-AC**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

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10. At such time as the U.S. EPA promulgates final regulations in 40CFR63 establishing MACT standards for the Surface Coating of Plastic Parts Industry pursuant to its December 4, 2002 proposed MACT regulations, and the Department adopts such standards into its rules, the permittee may apply for a permit amendment to comply with any applicable less restrictive compliance requirement of the promulgated MACT rather than the case-by-case MACT, except that the RTO control device already installed shall continue to be operated as required by this permit since it is the basis for the PSD reclassification as a synthetic minor facility. If such a requested amendment results in a modification, as defined by Department rules and the State Implementation Plan (S.I.P.), it shall be processed as a permit revision in accordance with the S.I.P. The new MACT, when adopted, shall be the BACT floor for PSD purposes in the event that the Department must reconsider the BACT provisions of this permit. [Rules 62-4.070(3), 62-212.400, F.A.C., MACT and BACT]

11. The facility shall adhere to the Revised BACT/MACT Determination. The Revised BACT/MACT Determination is attached as part of this permit following this page.

APPENDIX BD - REVISED DETERMINATIONS OF  
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)  
AND  
MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT)

**Nailite International, Inc.**  
**Miami, Dade County**

**New Panel Line/Relocation of Existing Line**  
**DEP File No. 0250407-005-AC**

**Department of Environmental Protection**  
**Division of Air Resources Management**  
**Bureau of Air Regulation**

**December 30, 2002**

**Nailite International, Inc.  
Miami, Dade County**

This revised BACT/MACT determination is related to the applicant's ongoing project to convert its processing technology from spray coating to non-spray pigment injection. This process conversion is expected to significantly reduce long-term emissions of toluene, a volatile organic compound (VOC) and a hazardous air pollutant (HAP), and other VOC/HAPs including xylene. In connection with the conversion, the applicant has applied to the Department for a revision of certain requirements in its existing air permit. The most important permitting change is an extension of the shutdown date for the old coating line (EU-001) from December 31, 2002 to December 31, 2003. The additional year of operation of the old line will be carried out in such a manner that the total controlled emissions from EU-001 and the new line (EU-002) will be less than the major source threshold of 250 tons per year, making Nailite a synthetic minor facility for PSD. Thus this revision removes BACT applicability for the new line while its MACT applicability remains unchanged since VOC/HAP emissions exceed the MACT threshold of 10 tons per year of any single HAP and 25 tons per year of total HAPs.

Since the new line was constructed as a BACT unit, some of the original permit requirements for the new line will be retained and emission limits will be set for the old and new lines based on actual test data as provided for in the former permit. The test-based emission limits will apply permanently for the new line while pollutant limits will be established for CY2003 operation of the old line. The Department will require that the old line be shut down permanently after December 31, 2003. MACT requirements for the new line are unchanged by this revision. Overall efficiency of capture and destruction for the new line (EU-004) will remain at 90 percent as in the original permit.

To provide further background for this revision, pertinent permitting actions are reviewed: On September 26, 2000, the Department issued Permit No. 0250407-003-AC (PSD-FL-289) to Nailite International, Inc. to construct a new plastic panel finishing spray line as a modification of its existing major facility formerly located at 1251 NW 165th Street in Miami, Dade County. The entire facility was being relocated to 1111 NW 165th Street, which is about 500 feet from Nailite's former location. The new spray line (EU-002) is housed in the new building along with the old line (EU-001), which was relocated to operate alongside the new line. Originally, the project was subject to review for Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) in accordance with Rule 62-212.400, F.A.C. The modification triggered PSD review for the new line because it resulted in a significant emissions increase of (VOC) with respect to Table 212.400-2, Florida Administrative Code (F.A.C.). The Department determined that the applicant's new line and the existing operation at the former location were "adjacent" according to the PSD rules and therefore comprised a single facility. Due to uncertainties in the capture efficiency of the old line, the Department did not have reasonable assurances initially that the controlled facility would come under the 250 tons per year threshold for PSD applicability, therefore, the PSD rules applied to the modification.

The project was also subject to a case-by-case Maximum Achievable Control Technology (MACT) Determination in accordance with Rule 62-204.800(10)(d)2, F.A.C. since it is a major source of hazardous air pollutants (HAP). In the time that has elapsed since the original construction permit was issued, the U.S. Environmental Protection Agency (EPA) has still not issued final MACT standards for plastic parts coating processes. On December 4, 2002, MACT standards were proposed for new and existing sources engaged in surface coating of plastic parts and products (see Federal Register/Vol. 67, No. 233, December 4, 2002, pages 72276-72327). However, until final MACT rules are promulgated, the Department is required by its rules to issue a case-by-case MACT determination for major sources of HAP. Therefore, the

## APPENDIX BD -- REVISED BACT/MACT DETERMINATION

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former MACT determination still applies for the new line and forms the basis for the permit limits pursuant to Specific Condition No. 3 in the revised construction permit (0250407-004-AC).

Other details of Nailite's operation and a description of the process were originally presented in the separate Technical Evaluation and Preliminary Determination issued concurrently with the original determinations. Therefore, this revised determination addresses mainly the new testing requirements for setting final emission limits.

### FINAL PERMIT LIMITS

Nailite conducted its first compliance test in April of 2001 after starting operations at the new location in October 2000. Although the construction permit required a capture efficiency test on Line No. 1 (EU-001) within 45 days of startup in the new location, the April 2001 test involved capture and destruction efficiency tests for only the new line, EU-002. In response to Miami-Dade County's May 17, 2002 written notice of violation regarding the capture efficiency test on EU-001, Nailite conducted another series of tests in June 2002. Those tests, conducted by a different contractor, included a destruction test while operating both the old and new lines together and a separate capture efficiency test on the old line.

The Department discovered significant calculation errors in both the 2001 and 2002 sets of test results, which were obtained by different contractors using different analyzers and calibration gases. The data lacked the proper calibration gas conversions that would have been required to report actual toluene emissions; thus, the Department questioned the accuracy of the results. Due to additional discrepancies noted in the 2001 and 2002 material balance data used to calculate capture efficiencies, the Department determined that both the April 2001 and June 2002 test data are invalid. Consequently, Nailite agreed to retest both lines during January 2003 for the purpose of setting emission limits as outlined herein.

It was agreed that the retesting will be conducted according to the following protocols: EPA Method 25A using propane as the calibration gas will be employed to measure VOC/HAP emissions. For emissions of toluene (C<sub>7</sub>H<sub>8</sub>), the analyzer senses the seven carbon atoms of each toluene molecule as though they were 7/3 or 2.33 propane molecules. Therefore, the analyzer's ppm output will be adjusted to get the theoretical actual concentration in terms of toluene. After correcting the theoretical factor for the analyzer's individual sensitivity and response factors, the actual factor will be reported and used to calculate actual toluene emissions. The same procedure using the appropriate factors will be followed for other VOC/HAPs emitted. Three sets of three one-hour tests will be conducted: (1) simultaneous overall capture and destruction efficiency while both the old and new lines are operating together at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit; (2) individual capture efficiency of EU-001 operating alone at permitted capacity; and (3) individual capture efficiency of EU-002 operating alone at permitted capacity. The capture efficiency shall be determined from the monitored material consumption and the measured concentration at the inlet of the air pollution control device. Destruction efficiency shall be determined from the concentrations at the inlet and outlet of the air pollution control device.

### MACT CONTROL TECHNOLOGY

VOC/HAP emissions consist primarily of toluene and xylene evolved during the coating process. The prior BACT/MACT determination established that VOC/HAP emissions will be controlled using a twin bed Regenerative Thermal Oxidizer (RTO) designed for a process gas flow rate of 27,000 acfm. Propane will be used at start-up as a secondary fuel, while the captured solvent will be the primary fuel.



APPENDIX BD - REVISED BACT/MACT DETERMINATION

VOC/HAP potential emissions from the new line are estimated at approximately 130.5 TPY. Approximately 90 percent of the VOC/HAP in the coating will be released in the paint booths while 10 percent remains in the coating. The design capture efficiency for the new line was originally set at 95 percent. The design destruction efficiency of the RTO was also set at 95 percent, although initial testing indicates that destruction efficiency will be above 99 percent. Therefore, until final testing is completed and limits established based on actual test results, the MACT overall capture and destruction efficiency requirement of 90 percent will remain unchanged.

Paint filters will be used to control particulate emissions from the spray booth operations. New circular ducting and a new filtering system will be installed to improve filtration and possibly the capture efficiency. PM/PM10 potential emissions are estimated at 4.7 TPY based on 25 percent over spray of coating in the booths and 95 percent removal by the paint filter pads.

Emissions of SO<sub>2</sub>, NO<sub>x</sub> and CO are projected to be well below 1.0 TPY.

**DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:**

John Reynolds, Permit Engineer  
New Source Review Section  
2600 Blair Stone Road, MS # 5505  
Tallahassee, Florida 32399-2400  
850/921-9530

Recommended By:

Approved By:

*Trina Vielhauer*  
*Trina* Vielhauer, Chief  
Bureau of Air Regulation

*Howard L. Rhodes*  
Howard L. Rhodes, Director  
Division of Air Resources Management

*12-31-02*  
Date:

*12-31-02*  
Date:

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

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.
- The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
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**APPENDIX GC**  
**GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]**

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

# Memorandum

# Florida Department of Environmental Protection

TO: Howard L. Rhodes

THROUGH: ~~Al Lincero~~ Trina Vielhauer

FROM: John Reynolds *JR*

DATE: December 30, 2002

SUBJECT: Approval of Permit – New Panel Spray Line/Relocation of Existing Line  
Construction Permit No. 0250407-005-AC  
Nailite International, Inc. - Miami

Approval is requested for the attached FINAL PERMIT that revises certain conditions in the original construction permit (0250407-003-AC/PSD-FL-289) issued on September 26, 2000. The original construction permit authorized Nailite to construct a new plastic panel spray coating line (No. 2 Line) and relocate the old No. 1 spray line from its former location to be connected with the air pollution control system installed for the new line.

In connection with Nailite's ongoing efforts to convert its process from spray coating to direct pigment injection, this revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules. However, this revision leaves Nailite's Maximum Achievable Control Technology (MACT) applicability unchanged. Under this revision, the PSD applicability threshold of 250 tons per year for the entire facility will not be exceeded, while the MACT applicability threshold of 10 tons per year of a single hazardous air pollutant (HAP) or 25 tons per year of total HAPs will be exceeded. This permit revision also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be shut down permanently. The maximum production capacity of 300,000 gallons of paints and solvents per line per year shall remain the same as in the original permit.

No comments were received during the public comment period. It is recommended that the permit be issued at this time.

Attachments