**CRB**

GEOLOGICAL & ENVIRONMENTAL SERVICES, INC.

November 15, 2002

Mr. Alvaro Linero
Florida Department of Environmental Protection
Division of Air
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Nailite International, Inc. Permit No. 0250407-003-AC (PSD-FL-289)

Dear Mr. Linero:

Please consider this document with attachment as request to reissue the above referenced permit with modifications, discussed below. The fundamental change requested by Nailite is the extension of the shutdown requirement for EU-001 from December 31, 2002 to December 31 2003. The basis for this request is Nailite's continued efforts to reduce the volume of its VOC usage in the painting portion of its manufacturing process. Through continued improvements and innovations to its manufacturing process and the installation of state-of-the-art emissions control units, Nailite to date has reduced its VOC emissions from just under 900,000 pounds in the year 2000 to just under 290,000 pounds (last three months projected) in 2002 while production has increased significantly. These emissions were calculated using measured efficiencies for destruction and capture of 99.3 % and an average of 87 %, respectively. Nailite acknowledges that these efficiencies are not representative of actual efficiencies for reasons not yet established. Therefore, for purposes of calculating and projecting potential emissions in the future, to be used as basis and justification for Nailite's request for reissuance and modifications of permit No. 0250407-003-AC (PSD-FL-289), significantly more conservative numbers for destruction and capture efficiencies were utilized. These numbers clearly show that in no event will Nailite exceed the threshold for a major facility pursuant to Rule 62-212.400 of the Florida Administrative Code (F.A.C.). Nailite's engineering staff continues to employ state-of-the-art modifications to its painting process and will continue to do so through the end of 2003. As shown in this document, Nailite's past and future projected emissions reductions will result in having to use only one of the two existing paint lines by the end of 2003. It is critical to note that the planned December 31, 2002 shutdown of EU-001 would force Nailite into a position to discontinue its focus on emissions reduction and concentrate on construction efforts of a new paint line. A capital expenditure of this magnitude would and could not include future engineering efforts aimed at process and costly equipment modifications reducing the use of painting, in effect making the new paint line obsolete within one year of its purchase. It is for these reasons that allowing operation of EU-001 with continued efforts in reducing the use of VOCs until the end of 2003, at which time EU-001 will no longer be needed, is singularly the best option from an operational, business, and environmental standpoint.

Background

Final Permit Number 0250504-001-AV was issued by DERM to the Nailite International, Inc. facility located at 1251 NW 165th Street on August 28, 1998 with a renewal application date of March 26, 2003 and an expiration date of August 27, 2003.

Nailite applied on February 21, 2002 to the DERM for a Title V Air Operation Permit Revision for the Nailite facility located at 1111 NW 165th Street, Miami, FL 33169. The purpose of this permit revision was to incorporate the terms and conditions of Construction Permit No. 0250407-003-AC/PSD-FL-289 into the facility's current Title V Operating Permit. The construction permit was issued September 26, 2000 to relocate the facility from 1251 NW 165th Street to 1111 NW 165th Street, Miami, Miami-Dade County, Florida 33169.

The relocated facility included the No. 1 plastic panel spray line consisting of three spray booths, and eight injection-molding machines. The construction permit also authorized the installation of a Regenerative Thermal Oxidizer (RTO) and the No. 2 plastic panel spray line consisting of three continuous spray booths and a curing oven. Captured emissions from the No. 1 Line (Emission Unit 001) and the No. 2 Line (Emission Unit 004) are required to be routed to the RTO.

Emission Limitations and Standards Section A.5 of the Title V permit states that *"In order to operate Emissions Unit No. 001 beyond January 1, 2003, (18 months of operation at the new location) the VOC/HAP capture system shall be designed to capture at least 95% of the total VOC/HAP spraying emissions calculated from a material balance while destroying at least 95% of emissions captured in the Regenerative Thermal Oxidizer (RTO). The permittee shall provide supporting documents including test results, by January 1, 2003 in order to demonstrate compliance with the aforementioned efficiencies."*

Section A.5 (revised) further requires that the *"The permittee shall continuously keep and maintain a five-year ongoing compilation of the following records to demonstrate compliance with the VOC/HAP emission limitations."*

CRB Geological & Environmental Services, Inc. (CRB) was retained by Nailite in late 2001 to provide consulting services to calculate air emissions and assist in record keeping for compliance of PSD Air Construction Permit No. PSD-FL-289 and the Title V Operating Permit.

Pursuant to the PSD Permit, Section III, Emissions Units Specific Conditions, No. 6, Nailite is required to maintain monthly records of material usage and amount of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emitted. In addition, the Permit requires that a rolling twelve-month and five-year total of VOC and HAP emissions be maintained.

The scope of services includes the maintenance of a database for Nailite that tracks material usage and air emissions. The program operates as follows: within two working days after the end of each month the previous month's data is provided to CRB. CRB calculates the total monthly emission rates and compiles the twelve-month and five-year rolling total for each material containing or emitting VOCs and HAPs used at the permitted emission units. CRB provides Nailite with a printout of the tabulated data. This information is kept on-site at all times.

In addition, CRB tracks the SARA Title III Toxic Release Inventory (TRI) Chemicals. This tracking system facilitates Nailite in the determination of reporting eligibility and in accuracy of

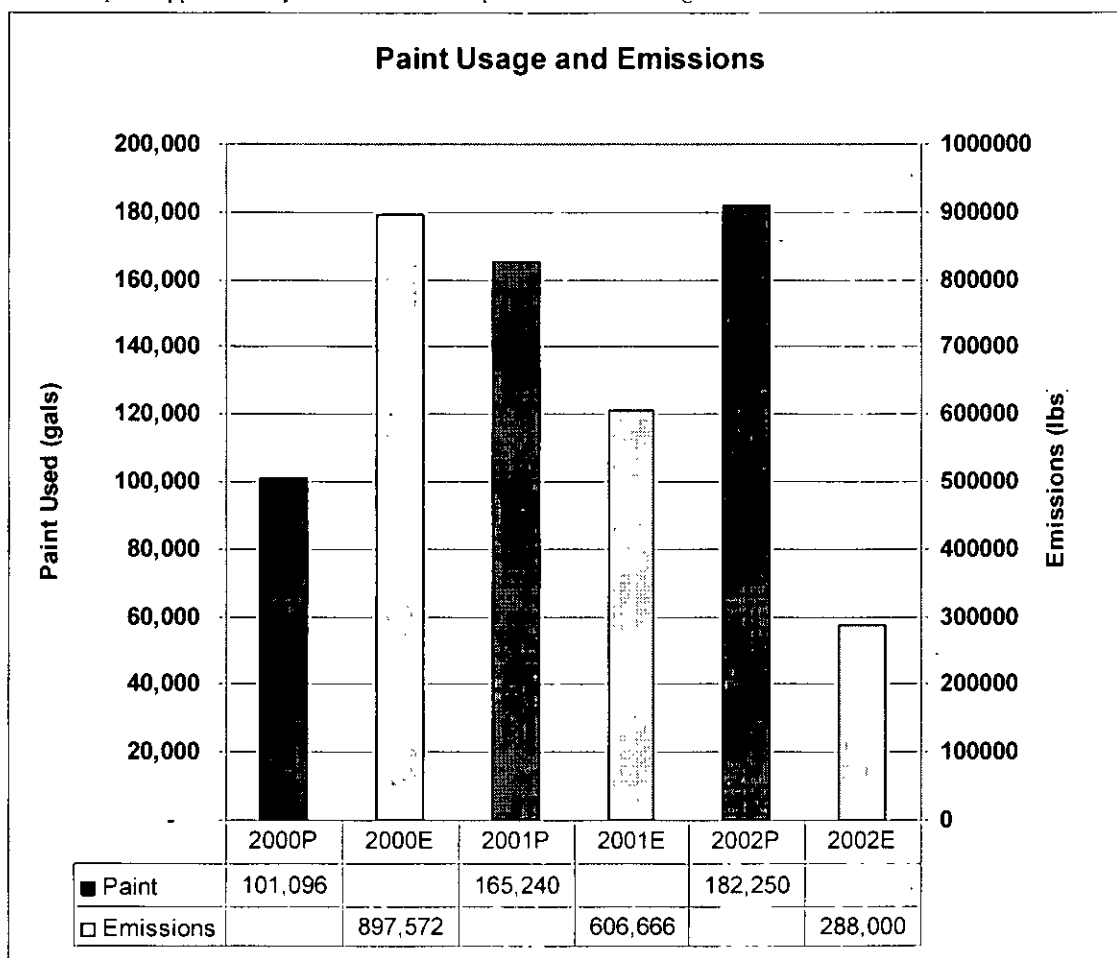
reporting. The system offers precise information relative to Nailite's continuing successes in the significant reduction of air emissions over the past three year period.

Nailite additionally provides a written report to the DERM, on a semi-annual basis that certifies the current compliance status with respect to the conditions of the Title V Permit. (March and September).

Emissions Reductions through 2002

Figure 1 displays Nailite's total emissions from 2000 to the present. Before 2000, Nailite's yearly emissions showed a dramatic increase from 476,300 pounds (238 tons) in 1998 to 628,450 pounds (314 tons) in 1999 to 897,000 pounds (449 tons) in the year 2000, when they peaked. The diagram in attachment A shows that as a result of several changes at Nailite, 2002 will exhibit the lowest emission rate (288,000 pounds or 144 tons) while usage rates will be at its highest.

Figure 1: Paint usage versus Emissions for years 2000 through 2002. Paint usage figures do not include VOCs which comprise approximately 45 % of combined paint and solvent usage.



The documented emissions reductions are the result primarily of Nailite's installation of a RTO system to which both lines have been hooked up. The old Paint Line (EU-001) was installed and

connected to the RTO in July 2001. The RTO was documented to be operating at 99.3 % destruction efficiency. Secondly, Nailite has implemented several engineering changes in the painting process which further reduced emissions. Among those changes are:

1. Fluid Line Improvements - regulator modifications and line re-configurations resulted in more even flow of paint through spray nozzles resulting in more evenly applied paint and consequent usage reduction. A 3 % reduction in paint usage was realized in EU-001.
2. Reciprocator Limit Switch – Installation of reciprocator switches in June 2002 improved control of paint spray duration as spray nozzles move over the panels reducing overspray and thus paint usage. A total reduction of 10 % paint/solvent usage was realized.
3. Higher Solids Paint – the implementation of higher solids paint initiated by Nailite in mid-2002 allows reduction in the use of solvents and thinners (VOCs). It is projected that over the course of 6 months, by the end of 2002, a reduction of over 17,000 gallons of solvent use will be realized. Further improvements and use of higher percent solids paints are planned for the year 2003. The conversion to high solids paints is projected to be 65 % complete by the end of 2002.

Nailite's Proposed Limitation of Operating Hours and Potential to Emit

Currently Nailite operates 16 hours per day and 6 days per week. This equals to a total of 4,992 hours per year. Nailite commits to not exceeding an average of operating 20 hours per day, 6 days per week, or 6,240 hours per year. The potential to emit with these restrictions is therefore 1.25 times greater than emissions levels in 2002.

In order to assure the FDEP that Nailite will not be a Major Facility by keeping emissions below 250 tons/year, the following conservative assumptions were made. The basis or starting point for calculating the potential to emit was taken from Nailite's usage rates in 2002, which amounted to a total of 2,042,778 pounds or 1,021 tons of paint/solvents. In addition to other conservative assumptions listed later, this approach has an inherent safety factor in that further reductions in solvent use such as continued increases in higher solids paint use and the introduction of paintless product are not taken into account. Thus, the future potential to emit for Nailite is based on 2,042,778 pounds times 1.25, which is 2,553,473 pounds or 1,277 tons of paint/solvent usage. This usage will continue to comply with the permitted limit of 300,000 gallons of paint/solvent usage per line per year. Based on information related to formulations currently used at Nailite, at the self-imposed limit of 6,240 hours per year operating level, Nailite will utilize no more than a total of 415,000 gallons of paint / solvent. As discussed above, this usage rate taken as the basis for calculating Nailite's potential to emit is significantly higher than the actual anticipated usage because it does not incorporate reductions in solvent use in Nailite's painting operations. These reductions will be discussed further below, under a separate heading.

Table 1 below lists the maximum possible usage in 2003 based on usage documented during 2002 with October, November, and December representing a year to date average for January through September of 2002. Destruction of 99 % and capture efficiencies of 70 % and 95 % for EU-001 and EU-004, respectively were used. As EU-004 is subject to BACT determination, its capture efficiency of 95% was assumed. Table 1 shows that even under rather conservative estimates for EU-001 capture, Nailite will not be a Major Facility. As mentioned earlier, the projected VOC usage does not contemplate reduction in 2003 due to full implementation of high solids paints and conversion of some of Nailite's product to a paintless process. Reductions of solvent use due to these changes in 2003 are discussed at a later point and will result in lower emissions than indicated in Table 1.

Table 1: Projection of 2003 emissions assuming 99 % destruction efficiency

	Projected Usage of VOCs in 2003			Projected Emissions 2003	
	Maximum VOC Usage at 6240 hrs/year (lbs)	EU-001 (50 %)	EU-004 (50%)	Capture Efficiency of EU-001 at 70% (lbs)	Capture Efficiency of EU-004 at 95% (lbs)
January	179,653	89,826	89,826	27,577	5,345
February	148,334	74,167	74,167	22,769	4,413
March	197,202	98,601	98,601	30,271	5,867
April	247,451	123,725	123,725	37,984	7,362
May	223,645	111,822	111,822	34,329	6,653
June	239,299	119,650	119,650	36,732	7,119
July	176,126	88,063	88,063	27,035	5,240
August	295,105	147,553	147,553	45,299	8,779
September	208,288	104,144	104,144	31,972	6,197
October	212,789	106,395	106,395	32,663	6,330
November	212,789	106,395	106,395	32,663	6,330
December	212,789	106,395	106,395	32,663	6,330
Total 2003 emissions for both lines:				234 tons	

Nailite is in the process of scheduling extensive emissions testing at its facility in December during which both lines will be tested individually and running simultaneously to determine capture efficiencies reliably. During these tests, the RTO destruction efficiency will be verified. It is requested that based on the test results a final determination will be made as to the permitted capture and destruction efficiency for the facility. Based on the above conservative projections, Nailite requests that FDEP extend the shut-down date for EU-001 until December 31, 2003.

Reductions in Emissions Projected for 2003

Thus far, it was shown that changes implemented at Nailite between 2000 and the end of 2002 resulted in a more than three-fold reduction in VOC emissions. The usage during the last three months of 2002 were projected as the monthly year-to-date (January to September) average. At an operation capacity cap of 6,240 hours per year the potential to emit, using a fairly conservative capture efficiency for EU-001 was shown to be 234 tons, well under the maximum limit for minor facilities under Rule 62-400. In order to be more conservative, additional reduction in the use of VOCs in 2003 were not considered up to this point. The following sections describe efforts underway at Nailite to further reduce its 2003 emissions from the projected 234 tons.

1. High Solids Paint – Nailite began implementing the use of high solids paints in July of 2002. Partial implementation, from July to December of 2002 will reduce VOC usage by close to 20,000 gallons. This means that without any further expansion in the use of high solids paints, the total reduction in VOC usage in 2003 will be an additional 20,000 gallons because the projected usage for 2003 was based on 2002 usage, which only benefited from 6 months of high solids paint use. In addition, Nailite is still in the process of converting existing paint formulations to high solid paints and will be doing so well into 2003. Nailite estimates that by the end of 2002, approximately 85 to 90%

of all convertible paints will be high solids. Nailite is also starting to investigate the possibility of using UV curable paints and is researching this possibility with local paint manufacturers. Although this process is not anticipated to be implemented in the near future, its realization would allow the use of paints consisting of 90 % solids and only 10 % solvents. Nailite estimates that by the beginning of 2004 UV curable paints could be brought on line gradually. Complete transition to UV curable paints could additionally cut emissions by more than half.

2. Paintless Operation – Nailite is among the last remaining manufacturers of plastic siding to use painting. The reason for this lies in Nailite's quality consciousness. Until recently, Nailite could not duplicate the same quality without painting as the final finishing step. Nailite is, however on the verge of achieving almost identical product quality by molding solid colored product and expects that by the end of 2002, this process will eliminate an additional 15 % of VOCs from its manufacturing process.
3. Improvement of Duct Work and Filtration – Re-design of the duct work currently in place will result in an increase in capture efficiency of both lines. The new design improves air movement through the duct work by eliminating corners and employing circular cross section of the ducts.

Summary

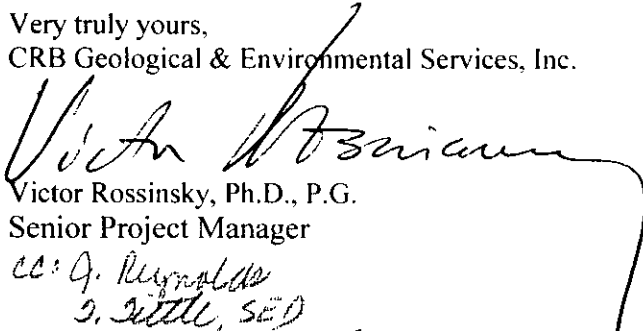
Through a number of emission controls and continued research and development, Nailite achieved a three-fold reduction in emissions from close to 450 tons per year to approximately 150 tons per year. Projected future emissions at a self imposed operations cap of 6240 hours per year would keep the facility well under the threshold of a major facility (250 tons per year). Reductions in VOC emissions planned for 2003, and already underway, will result in additional significant reductions in VOC emissions. In the interest of presenting FDEP with conservative estimates, future reduction in VOC usage were not taken into account in calculating emissions rates for 2003. The calculations themselves utilized a conservative capture efficiency of 70 % for EU-001. EU-004 capture efficiency was kept at the BACT determination of 95 %. Destruction efficiency of 99 %, which is lower than the actual measured destruction efficiency was utilized.

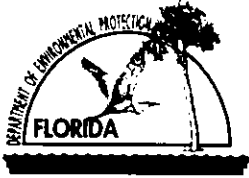
Based on the above, Nailite requests that permit 0250407-003-AC (PSD-FL-289) be reissued with the following modifications:

1. extend the shut-down date for EU-001 to December 31, 2003
2. Utilize results from emissions testing scheduled for December 2002 to establish capture and destruction efficiency requirements.
3. Incorporate operations cap of 6,240 hours per year to insure status of minor facility with respect to Rule 62-400.

Per your request, the first pages of Form No. 62-210.900(1) are included as attachment. If you have any questions or concerns, please don't hesitate to contact me at (305) 447-9777.

Very truly yours,
CRB Geological & Environmental Services, Inc.


Victor Rossinsky, Ph.D., P.G.
Senior Project Manager
cc: G. Reynolds
D. Little, SED
M. Nathan, DEAM



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Nailite International, Inc.	
2. Site Name: Nailite International, Inc.	
3. Facility Identification Number: 025047 [] Unknown	
4. Facility Location: 1111 NW 165 th Street Street Address or Other Locator: City: Miami, FL County: Miami-Dade Zip Code: 33169	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Mr. John Perry, Vice President of Operations	
2. Application Contact Mailing Address: (same as above) Organization/Firm: Street Address: City: State: Zip Code:	
3. Application Contact Telephone Numbers: Telephone: (305) 620-6200 x241 Fax: (305) 623-8227	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	11-20-02
2. Permit Number:	0250407-005-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

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

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

Air Construction Permit Application

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

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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Mr. John Perry, Vice President of Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Mr. John Perry, Vice President of Operations Street Address: 1111 NW 165 th Street City: Miami State: FL Zip Code: 33169
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (305) 620-6200 x241 Fax: (305) 623-8227
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> Signature <u>John Perry</u> Date <u>11-19-02</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Raymond Baddour Registration Number: 56633
2. Professional Engineer Mailing Address: Organization/Firm: CRB Geological & Environmental Services, Inc. Street Address: 4573 Ponce de Leon Blvd. City: Coral Gables State: FL Zip Code: 33146
3. Professional Engineer Telephone Numbers: Telephone: (305) 447-9777 Fax: (305) 567-2853

4. Professional Engineer Statement:

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

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

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

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

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

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

Signature: _____

Date: Mar. 15, 2002

(seal)

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Nailite requests permit condition modifications in order to re-engineer existing production and emission units EU 001 and EU 004 to foster continued significant reduction in air emission rates. Continued engineering research and design engineering efforts by Nailite's staff to improve RTO intake and capture efficiencies and to additionally improve paint transfer efficiencies will result in significant decrease in air emission of HAPs and VOCs.

Nailite's goal is to become a Minor Facility under PSD (rather than its current status as a PSD Major Facility) in 2003.

2. Projected or Actual Date of Commencement of Construction: 01 May 00

3. Projected Date of Completion of Construction: 31 Dec 03

Application Comment

Section A.5 of Nailite's Title V Permit requires the shutdown and discontinuance of operation of Paint Line Number 1 (Emission Unit 001) by January 1, 2003. Nailite is requesting that this mandate be extended to January 1, 2004 to allow continuing engineering research to be conducted based on accurate capture and destruction efficiency test results currently scheduled for December 10th and 11th, 2002 that is expected to more appropriately reflect true current operating conditions. This testing will be conducted in close coordination with the FDEP, DERM, Koogler and Associates, CRB, and Nailite and will provide a reliable baseline for Nailite's current emission situation. With over a threefold reduction in emissions over the last two years and scheduled improvements and changes to the manufacturing process scheduled for 2003, which will result in further emissions reductions, Nailite's request to extend the shut-down date for EU-001 is justifiable.

Nailite's chosen strategy is to extend the life of the EU-001 until changes in the painting portion of the manufacturing process result in adequate paint usage reduction so that only one paint line will be required. This strategy has already had a tremendous impact on emissions rates, having resulted in a threefold emissions reduction of the last three years, and will continue to result in emissions reductions in 2003. Nailite estimates that by the end of 2003, EU-001 will no longer be required. It is critical to note that the planned January 1, 2003 shutdown of EU-001 would force Nailite into a position to discontinue the aforementioned engineering research and focus on construction efforts of a new paint line. A capital expenditure of this magnitude would and could not include future engineering efforts aimed at making the new paint line obsolete within one year of its purchase. Allowing operation of EU-001 with continued efforts in reducing the use of VOCs until the end of 2003 is singularly the best option from an operational, business, and environmental standpoint.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 578.4 North (km): 2867.2			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 25/55/25 Longitude (DD/MM/SS): 80/13/9			
3. Governmental Facility Code: O	4. Facility Status Code: A	5. Facility Major Group SIC Code: 30	6. Facility SIC(s): 3089
7. Facility Comment (limit to 500 characters): Final Permit Number 0250504-001-AV was issued by DERM to the Nailite International, Inc. facility located at 1251 NW 165 th Street on August 28, 1998 with a renewal application date of March 26, 2003 and an expiration date of August 27, 2003. Nailite applied on February 21, 2002 to the DERM for a Title V Air Operation Permit Revision for the Nailite facility located at 1111 NW 165 th Street, Miami, FL 33169. The purpose of this permit revision was to incorporate the terms and conditions of Construction Permit No. 0250407-003-AC/PSD-FL-289 into the facility's current Title V Operating Permit. The construction permit was issued September 26, 2000 to relocate the facility from 1251 NW 165 th Street to 1111 NW 165 th Street, Miami, Miami-Dade County, Florida 33169. The relocated facility included the No. 1 plastic panel spray line consisting of three spray booths, and eight injection-molding machines. The construction permit also authorized the installation of a Regenerative Thermal Oxidizer (RTO) and the No. 2 plastic panel spray line consisting of three continuous spray booths and a curing oven. Captured emissions from the No. 1 Line (Emission Unit 001) and the No. 2 Line (Emission Unit 004) are required to be routed to the RTO.			

Facility Contact

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