

Golder Associates Inc.

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



SEP 18 2000

BUREAU OF AIR REGULATION

September 15, 2000

0037523

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:

Golder on behalf of Nailite International, Inc. has reviewed DEP's counter offer letter dated September 13, 2000 for the above referenced facility. Nailite finds the conditions of the counter offer acceptable. It should be noted that in Condition No. 2, the second sentence should be verified. It is our opinion that the 18 months is a typographical error and it should be 90 days.

We appreciate all the efforts undertaken by DEP and DERM to clarify the permit conditions and look forward to receiving the air construction permit. In the meantime, if you have any questions concerning this letter, please feel free to contact me at (352) 336-5600.

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
M. Muthiah, DERM
J. Baldman, SED
M. Neubeck, OGC
EPA
NPS

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Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
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**Golder
Associates**

RECEIVED

SEP 13 2000

September 12, 2000

BUREAU OF AIR REGULATION

0037523

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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

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

Dear: Mr. Linero

Please find attached a version of the specific conditions to the above-referenced permit, which has been revised to include the terms discussed during yesterday's conference. For the ease of review, a copy of the same language is included with track changes against the language contained in John Reynolds' electronic mail of last Wednesday (additions in red/deletions in blue). We have worked to limit revisions, and believe that the changes are not only consistent with Mr. Reynolds' e-mail but also accurately reflect the consensus reached during our discussions with the Department and DERM. Hopefully, the Department agrees and Nailite can move forward with this project.

Please let us know as soon as possible if the attached language is acceptable to the Department so that we can discuss incorporation of the specific conditions into the final permit and accompanying documents, and Nailite can withdraw its pending request for an extension of time related to administrative proceedings.

Once again, Nailite appreciates the Department's consideration of this matter and please do not hesitate to call if you have any questions."

Sincerely,

GOLDER ASSOCIATES INC.

Benny Susi, P.E.
Assoicate

BS/jkw

cc: David Steedman, Nailite International, Inc.
J. Reynolds, FDEP
M. Muthiah, DERM

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SED
EPA
NPS

The following specific conditions apply to the following emissions units:

| Emission 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) |
| 005 | No. 3 Line (3 Continuous Spray Booths and a Curing Oven) |

[Note: This facility is subject to PSD for VOC and MACT for HAP as indicated in the 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 existing air operation permit for the existing No. 1 Spray Coating Line effective upon relocation and startup of the existing No. 1 Spray Coating Line in its new location. Emissions Units 001, ~~(and 005 upon the replacement of 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. Within 90 days following the startup of spray coating on the new No. 2 Spray Coating Line (Emissions Unit 004), the existing No. 1 Spray Coating Line (Emissions Unit 001) shall be 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 BACT/MACT]
3. The air pollution control system installed 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 Emission Unit 004 shall be designed to capture at least 95 percent of the total VOC/HAP emissions generated from the panel spraying ~~operation-booths~~ while destroying at least 95 percent VOC/HAP in the RTO (90.3 percent overall capture and destruction in the booths and the RTO). The same requirements, including testing as specified in Specific Condition No. 4 below, shall apply to Emission Unit 004 ~~when installed pursuant to this permit as specified in Specific Conditions No. 4 below if it remains in operation beyond one year at its new location~~. Appropriate emission limits and compliance requirements for the RTO 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 45 below, shall be set at a sufficient percentage above the average of representative runs to provide the permittee with an adequate and reasonable margin for compliance, and shall be incorporated into the Title V permit for this facility. [Rules 62-4.070(3) and 62-212.400, F.A.C., and BACT]
4. Within 18 months of the relocation and startup of the existing No. 1 Spray Coating Line in its new location, the permittee shall either upgrade the same to capture at least 95 percent of the total VOC/HAP emissions generated in the panel spraying booths or replace the same with Emission Unit 005, which shall consist of three (3) new continuous spray booths and a curing oven of the same or similar performance limits as those of Emission Unit 004. After Unit 005 is connected to the RTO,

emission limits and compliance requirements for the RTO control system shall be reestablished in accordance with specific condition 3 above.

4.5. Pursuant to the requirements of Specific Condition 3 above, the permittee shall demonstrate the VOC/HAP capture and destruction efficiency of Emissions Unit 004 (and of Emissions Unit 005 after startup of that unit pursuant to Specific Condition 4 above) by comparing raw VOC/HAP emissions generated over a 3-hour period (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, as described in 40 CFR 60 Appendix A. A ~~capture efficiency and~~ destruction efficiency test shall also be performed for Emissions Unit 001 within 45 days after startup of the relocated line. 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) and 62-212.400, F.A.C., and BACT].



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

SEP 8 2000

RECEIVED

SEP 13 2000

BUREAU OF AIR REGULATION

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: Prevention of Significant Deterioration (PSD) Preliminary Determination for Nailite International, Inc. located in Miami (Dade County), Florida
PSD-FL-289

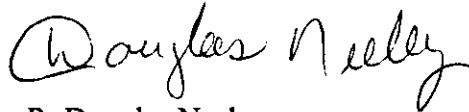
Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination (dated August 4, 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 PSD review.

Based on a review of the preliminary determination, EPA has the following comment. 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 preliminary determination 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 preliminary determination. If you have any questions regarding the above comment, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,



R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: G. Reynolds
O. Steedman, Nailite International
M. Mathial, DERM
SED
NPS

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 08-Sep-2000 01:41pm

From: Susi, Benny
BSusi@GOLDER.com

Dept:

Tel No:

To: John Reynolds TAL 850/921-9536 (John.Reynolds@dep.state.fl.us)
To: MuthiM (MuthiM@co.miami-dade.fl.us)
To: Alvaro Linero TAL (Alvaro.Linero@dep.state.fl.us)
To: Cindy Phillips TAL (Cindy.Phillips@dep.state.fl.us)
CC: David Steedman (E-mail) (dsteedman@nailite.com)

Subject: Re: Confirmation of Participation in Nailite Teleconference

I have rescheduled a conference call for Monday 10:30 am. The number to call is 816⁷0766

Chairperson: Benny Susi

816-650-0766

-----Original Message-----

From: John Reynolds TAL 850/921-9536

[mailto:John.Reynolds@dep.state.fl.us]

Sent: Wednesday, September 06, 2000 12:47 PM

To: MuthiM@co.miami-dade.fl.us; BSusi@GOLDER.com; Alvaro Linero TAL;
Cindy Phillips TAL

Subject: Confirmation of Participation in Nailite Teleconference

Sensitivity: Confidential


Benny has scheduled the Nailite teleconference for tomorrow (Thursday) at 1:00

p.m. The call-in number is 816-650-0772. When calling in, state that Benny Susi

is the Chairperson. Please confirm your availability via e-mail reply.

Thanks.

JR.

| | | | |
|--|--|---|--|
|  EPA | | United States of America Environmental Protection Agency | |
| A FAX FROM <u>Region 4</u> | | | |
| TO: <i>Al Linero - FOEP</i> | | FAX NO: <i>(850) 922-6979</i> | |
| SUBJECT: <i>Nailite</i> | | | |
| FROM: <i>Jim Little / Art Holmeister</i> | | PHONE NO: <i>(404) 562-9118 / 9125</i> | |
| OFFICE: APTMD | | FAX NO. FOR: (404) 562-9095 | |
| COMMENTS: <i>Original being sent by air mail</i> | | | |
| DATE <i>9/8/00</i> | | NO. OF PAGES <i>3</i> (including cover sheet) | |

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

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

SEP 8 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: Prevention of Significant Deterioration (PSD) Preliminary Determination for Nailite International, Inc. located in Miami (Dade County), Florida
PSD-FL-289

Dear Mr. Linero:

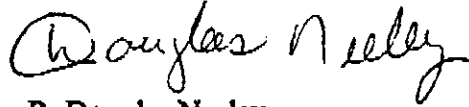
Thank you for submitting the above referenced PSD preliminary determination (dated August 4, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the construction of a panel finishing spray line which will operate in conjunction with existing operations 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 PSD review.

Based on a review of the preliminary determination, EPA has the following comment. 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 preliminary determination still needs to identify the option and discuss why it was not selected as BACT.

2

Thank you for the opportunity to comment on the Nailite International preliminary determination. If you have any questions regarding the above comment, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,



R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

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MIAMI-DADE COUNTY, FLORIDA

SEP 06 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

August 28, 2000

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

RE: Comments on Draft Air Construction Permit (PSD) DEP File No. 025407-003-AC
(PSD-FL-289)

Dear Mr. Reynolds:

DERM's Air Facilities Section received the draft air construction permit (PSD permit) to construct a new panel spray coating line and relocate the existing spray line so that it can be incorporated with the air pollution control system being installed for the new line. The following are our comments for your consideration regarding the draft permit:

1. Within the Technical Evaluation on page #5, it's stated that in the proposed new line the spray booths are designed with a closed faced side draft booth. An inspection of this facility conducted by DERM revealed that they have a partially closed-face draft booth, not a completely closed one.

In addition, this Technical Evaluation states that "The only opening in the spray booth will be the conveyor slot which will be 6 feet wide and 1 foot tall." The DERM inspection further revealed that the booths have 4 bottom openings and each opening is approximately 3 - 4 feet high.

2. Page #2 of the PSD permit states within the emissions unit description that the EU#3 consists of 3 continuous spray booths and a curing oven, but on page # 8 the same table failed to mention the curing oven.
3. Page # 2 states that the new plastic panel facility will be located 500 feet west of the existing facility. Actually, the new facility location is EAST of the existing facility.
4. Page #8, item #3 mentions a 95% capture and destruction efficiency for the EU #3 (the new unit), but did not mention or provide a percentage (%) in terms of capture and destruction efficiency for EU #1 (the unit that will be relocated).

We understand that the existing spray line in the current location will not meet the 95% capture efficiency as such, and it does not have any control equipment to reduce emissions. It remains DERM's position that, since the facility is expanding its operations, increasing productivity and relocating the current operation, **that these modifications to the facility warrant the facility's overall compliance with the MACT standards.** We indicated our recommendations in my previous letters dated May 25th and June 16th of this year as follows:

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.

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%.

We have discussed this before with the facility representative and FDEP staff, and our position still remains the same in this regard. We would like to reemphasize our recommendation that both the new and the relocated spray lines must meet the 95% capture and destruction efficiency. In addition, proper language should be added to require testing of the spray lines to verify the capture efficiency.

As per our discussion, if the facility needs more time to bring the existing line into compliance with the 95% capture and destruction efficiency, it is fine with us if you grant a one-year time extension from start-up to bring the existing line into compliance. If they fail to comply with the capture and destruction efficiency requirements by the allotted time, the facility should shut down the existing line once the new line is fully operational and meets their manufacturing needs.

If you have any questions regarding this memo, please contact me at (305) 372-6925.

Sincerely,

Mallika Muthiah

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

Enc. Inspection report

cc: *G. Reynolds*
D. Buff, Solder
D. Stillmore, Nailite
SED
NPS
EPA

Golder Associates Inc.

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



September 1, 2000

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

RECEIVED 0037523
SEP 05 2000
BUREAU OF AIR REGULATION

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

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

Dear Mr. Linero:

Golder is in receipt of the Department's draft air construction permit (PSD permit) concerning the construction by Nailite of a new panel spray coating line to be located at 1251 N.W. 165th Street, Miami, Florida. The draft permit also imposes certain conditions with respect to Nailite's existing, Title V permitted, paint line which will be relocated to the new facility after the new line is in operation. Golder has discussed the draft permit for the above referenced facility with John Reynolds of DEP and Mallika Muthiah of Miami-Dade County DERM in order to review certain aspects of the draft permit about which Nailite is unclear and to discuss the possibility of some relatively minor rewording prior to finalization to avoid uncertainty and to insure that all aspects of the permit documents are consistent. In order to accommodate these discussions and hopefully resolve these issues without the formal requirement of an administrative hearing, Golder, after obtaining assurances from DEP staff that an extension would not present a problem, filed a request with Ms. Teri Donaldson of DEP for a 60 day extension of time in which to file for an administrative (a copy of this August 21, 2000 request is attached hereto). Nailite appreciates the extent to which DEP has worked with us in getting to this stage of the permitting process. The purpose of this letter is to present our comments and some draft language to assist the DEP with understanding a few of Nailite's concerns with the draft permit, as currently worded. Hopefully the matters discussed herein can serve as an outline for a possible meeting to discuss how best to resolve these issues. We have also attached hereto copies of the permit documents which contain Nailite's requested revisions, as redlined text. As a review will show, these requested changes, which are minor in nature, are designed to clarify certain issues and keep the documents consistent with one another. The requested revisions do not significantly change the terms of the permit and are consistent with the permit application and filings with the DEP to date.

By way of background, for many years Nailite has been manufacturing plastic shingles used in the construction industry out of a plant located at 1251 N.W. 165th Street, Miami, Florida. Nailite provides jobs for many employees in the Miami-Dade County area and has done its share to support the community over the years. Due to the surge in construction across the nation over

the last decade, Nailite has outgrown its existing facility and is relocating to a new manufacturing facility at 1111 N.W. 165th Street, Miami, Florida. This new facility will be a big improvement over the old facility not only in terms of capacity, but also in terms of air emissions. The new facility will incorporate state-of-the-art spraying equipment as well as a Regenerative Thermal Oxidizer (RTO) to significantly reduce emissions associated with the facility, while at the same time increasing production. It is the intent of Nailite International to increase the production of their facility while making substantial improvements on reducing emissions associated with the facility. These efforts have been demonstrated to both DEP and DERM by Nailite's investment of substantial capital in state-of-the-art spraying equipment and an RTO to destroy volatile organic compounds and hazardous air pollutants. As part of the relocation of its manufacturing plant, which is being done in stages so as to avoid a shut-down, Nailite plans to move the spray paint booths from its existing facility, which is currently operating pursuant to a Title V permit, to the new facility. During the permitting process Nailite agreed with DEP and DERM to connect the spray line from its existing plant to the RTO, thereby further reducing emissions from the new plant. When these existing booths are relocated to the new plant they will also be hooked up to the RTO, thereby significantly reducing emissions from current levels. In fact, when the new spray line and the existing spray line are eventually combined at the new plant and connected to the RTO, total emissions from the plant will be lower than that of the existing facility. More specifically, total facility emissions, even after the addition of the new spray paint line, is expected to be approximately 147.7 tpy lower than emissions from the current facility, and to be below 250 tpy for VOC.

Other than an issue related to the capture efficiency of the new spray line, the primary concerns Nailite has with certain language incorporated into the draft permit arise mostly from uncertainty as to whether and when certain permit requirements apply to the new paint line, the old paint line or both. As described in more detail, Nailite would request that: 1) the capture efficiency for the new spray line be set at 90 percent to take into account the actual mechanics of the line and other relevant factors as set forth in the application and accompanying documents, 2) that the draft permit be reworded at certain locations to clarify that the facility limit of 130.5 tpy applies only to the new paint line as noted in the permit application and supporting documents, 3) that the terms of the permit allow Nailite at least 90 days to relocate the existing paint line from Nailite's current plant to its new plant in order to prevent economic hardship and allow the orderly construction of the new plant, and 4) that the permit reflect the change from propane to natural gas as fuel for the RTO. These requested revisions are discussed in more detail below and, as previously noted, specific language recommendations have been incorporated as redlined text on the attached draft permit documents.

The application submitted by Nailite is a PSD/MACT application solely for a new panel coating line. However, the draft permit has been expanded in certain respects to include the existing line. Unfortunately, a few of the conditions intended for the new line, such as capture efficiency and destruction efficiency testing, may, under the current wording of the draft permit, be construed as being applicable to the existing line, even though they are not achievable by this older equipment. While connecting the existing line to the RTO will substantially reduce current emission levels, the design of the existing line simply cannot meet the same capture efficiency and destruction efficiency testing limits as the new line. While we believe that the likely intent

of the permit language is to cover only the new paint line in connection with these items, the suggested changes attached hereto would serve to clarify these issues. Moreover, the 95 percent capture efficiency limit on the new spray line is not practicable as described below given the design of the line itself.

Although the new spray line is a state-of-the-art spray line designed with sustained negative air pressure at each booth to capture and direct all flash off occurring in each booth to the RTO, the possibility of fugitive emissions between the spray booths may occur and cannot be captured. Golder previously provided DEP with an evaluation of the flash off between the spray booths and the estimate of fugitive emissions using mass balance and laboratory testing. This evaluation determined that fugitives are actually much lower than stated in the permit application. The test method suggested in the draft permit to measure concentration at the start of the spraying operations and at the inlet of the RTO, however, will not account for Nailite's complex spray line that includes three separate spray booths, flash-off between the booths, and retention of VOC on the panels, and will generate results which will not comply with the requested 95 percent capture efficiency for the entire paint line, even though the interior of each spray booth will capture 95 percent of what is sprayed. For this reason, Nailite requests that capture efficiency for the new spray line be set at 90 percent.

While the existing spray line has a valid Title V permit and is arguably not subject to PSD and new conditions through the draft permit, Nailite has agreed to subject the existing line to the RTO and otherwise improve the capture and destruction efficiency of the same. Nailite simply requests that any requirements sought to be placed on the existing paint line through the instant permit process be reasonable and practicable taking into account the overall improvements being made and the economic considerations involved. It must be remembered that overall efficiency is improving even when new paint lines are being added.

The installation of the new spray line with controls is estimated to emit no more than 130.5 TPY (fugitive and stack emissions with control). This is based on 90 percent capture and 95 percent destruction efficiency. Connecting the existing spray line to the RTO, assuming 80 percent capture will result in estimated emissions of the existing paint line of 87.8 TPY (14.6 TPY stack emissions with control and 73.2 TPY fugitives). By voluntarily providing RTO control to the existing spray line, a reduction of emissions of 278 TPY based on 1999 emissions of 366 TPY is estimated to be achieved (366 TPY-87.8 TPY). This represents an overall reduction of nearly 150 TPY while increasing the production rate of the facility. This improvement in the overall reduction of emissions for this facility provides a benefit for the environment as well as a benefit to Nailite from an increased production standpoint.

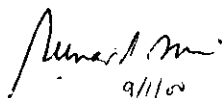
Based on our review and understanding of Nailite's operations, the intent of the Nailite to comply with all permit limits, and the accuracy of test procedures that reflect the capture efficiency, the applicant respectfully requests that the draft permit be revised as follows:

1. Capture efficiency for the new spray line should be set at 90 percent as opposed to the current figure of 95 percent. Nailite will agree to test for capture and destruction efficiency on the new line and proposes that the limits be expressed as a combined

- capture/destruction efficiency limit as suggested in the permit.
2. We would request that the permit language be clarified to indicate that the 130.5 TPY facility limit applies solely to the new spray line.
 3. Nailite would also request that it be provided a 90-day period after the installation of the new spray line within which to relocate the existing spray line to the new facility. This is necessary in order to avoid Nailite having to shut down for a period of time, which would obviously present a substantial economic hardship.
 4. We have proposed to change the fuel from propane to natural gas for the RTO. This has been reflected in the comments and in the attached recommended changes to the permit.

Please call if you have any questions concerning this information and the attached drafts and we greatly appreciate your consideration and cooperation with this matter. Additionally, we will be contacting you within the next few days to discuss these issues and any recommendations you may have on how best to proceed in a timely manner.

Sincerely,
GOLDER ASSOCIATES INC.



9/1/00

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

BS/jkw

cc: David Steedman, Nailite
David Buff, Golder

Golder Associates Inc.

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



September 1, 2000

0037523

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

Attention: Office of General Council

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

Dear: Ms. Teri Donaldson

This correspondence is submitted on behalf of Nailite International, Inc. (Nailite). The draft permit was issued on August 4, 2000 and received on August 7, 2000. Nailite has received a draft permit regarding the installation of a new panel spray coating line. In addition, Nailite has agreed in concept to connect an existing panel coating line to new pollution control equipment being installed. The specific permit conditions regarding technical aspects of the new coating and existing lines require further discussions with the FDEP staff.

As a result, a 60-day extension to file an administrative hearing pursuant to 120.569 and 120.57 F.S. is requested. The request has been discussed with the Department's permitting staff and they indicated no problem with granting the extension.

Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read "Benny Susi", is written over a horizontal line.

Benny Susi, P.E.
Assoicate

BS/jkw

cc: David Steedman, Nailite International, Inc.
A.A. Linero, FDEP BAR

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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



August 21, 2000

0037523A/8

Mr. C.H. Fancy, P.E.
Chief, Bureau of Air Regulation
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, FL 32301

Re: Nailite International, Inc.
Proof of Public Notice
Project No. 0250407-003-AC (PSD-FL-289A)
Installation of New Panel Line and Relocation of Existing Panel Line

Dear Mr. Fancy:

Golder Associates Inc. on behalf of Nailite International, Inc. is transmitting herein the official notarized proof of Public Notice of Intent to Issue Air Construction Permit as required by Section 403.815, and 403.0815 F.S. DEP Rules 62-110.106(7)(a), F.A.C. for your files.

Sincerely,

GOLDER ASSOCIATES INC.

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

Benny Susi, P.E.
Associate

BS/arz

Enclosure: Proof of Public Notice

cc: D. Buff, Golder
D. Steedman, Nailite

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G. Reynolds
SED
DC DERM
EPA
NPS

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AUG 21 2000

GOLDER ASSOCIATES INC.

The Miami Herald

www.herald.com
www.elherald.com

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BUREAU OF AIR REGULATION

**PUBLISHED DAILY
MIAMI-DADE-FLORIDA**

**STATE OF FLORIDA
COUNTY OF DADE**

Before the undersigned authority personally
appeared:

JEANNETTE MARTINEZ

who on oath says that he/she is

CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at
Miami in Dade County, Florida; that the attached
copy of advertisement was published in said
newspaper in the issues of:

August 11, 2000

Affiant further says that the said The Miami Herald
is a newspaper published at Miami, in the said Dade
County, Florida and that the said newspaper has
heretofore been continuously published in said Dade
County, Florida each day and has been entered as
second class mail matter at the post office in Miami,
in said Dade County, Florida, for a period of one
year next preceding the first publication of the
attached copy of advertisement; and affiant further
says that he has neither paid nor promised any
person, firm or corporation any discount, rebate,
commission or refund for the purpose of securing
this advertisement for publication in the said
newspapers(s).

Jeannette Martinez
Sworn to and subscribed before me this

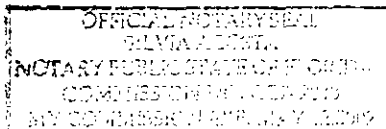
__ 11th __ day of __ August __, 2000

My Commission

Expires: __ May 12, 2002 __

Silvia Acosta

Silvia Acosta
Notary



PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0250407-003-AC (PSD-FL-289)

Nailite International, Inc.
New Panel Spray Coating Line/Relocation of Existing Line
Miami-Dade County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit pursuant to the Rules for the Prevention of Significant Deterioration of Air Quality (PSD) to Nailite International, Inc., to install a new panel spray coating line and relocate the existing line from an adjacent location to 1111 NW 165th Street, Miami, Dade County A Best Available Control Technology (BACT) determination and a Maximum Achievable Control Technology (MACT) determination were required pursuant to Rules 62-212.400 and 62-204.800(10)(d)2, F.A.C. for volatile organic compounds (VOC) and hazardous air pollutants (HAP), respectively. The affiant's name and address are: Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

The existing line is located at 1251 NW 165th Street, south of the Palmetto Expressway and west of I-95. The new line will be located (and the existing line will be relocated) to the nearby site as described above. The Department determined that the new line will be part of the existing facility based on common control, industrial classification, and adjacency. Because the new plant is considered by the Department to be a modification of an existing major facility, PSD review and a BACT determination are required.

Nailite manufactures plastic shingles used in the construction industry. Emissions of VOC/HAP result primarily from the application and curing of coatings. The project will be constructed in three phases. The existing line will be moved to the new location. The new line will be installed and both lines will be connected to the control equipment. Finally, the old line will be modernized at a future date. Per Nailite's application, VOC emissions from the new unit will be 131 tons per year (TPY), including 94 TPY of HAP (toluene and xylylene). This level of control will be accomplished by regenerative thermal oxidation.

Historical VOC emissions from the existing line have been greater than 200 TPY with minimal control. Because the existing line will be connected to the RTO unit, potential and actual emissions of VOC and HAP from the entire facility will be lower in the future despite a production increase.

EPA is developing MACT standards for plastic parts coatings pursuant to Section 112(d) of the Clean Air Act. Because the standards have not been finalized, the State must prepare a case-by-case new source MACT determination in accordance with Section 112(g) of the Act and 40CFR63, Subpart B as adopted in the Department's Rules. The final permit will serve the purposes of the required Notice of MACT Approval. The Department has determined that the proposed RTO system with a destruction efficiency of 95 percent constitutes both BACT for VOC and MACT for HAPs.

Emissions of other pollutants will be minimal. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards or PSD increment.

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

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing under sections 120.569 and 120.57 of the Florida Statutes). The petition must contain the information set forth below and must be filed (received) in the Office General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for the service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

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

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

| | | |
|---|--|--|
| Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 St. Magnolia Drive Tallahassee, FL 32301 Telephone: (850) 488-0114 Fax: (850) 922-6879 | Miami-Dade County Dept. of Environmental Mgmt. 33 S.W. 2 nd Avenue, Suite 900 Miami, FL 33130-1540 Telephone: (305) 372-6925 Fax: (305) 372-6954 | Dept. of Environmental Protection Southeast District 400 North Congress Avenue West Palm Beach, FL 33416-5425 Telephone: (561) 681-6600 Fax: (561) 681-6755 |
|---|--|--|

The complete project file includes the application, technical evaluations, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Documents related to the Department's proposed action are available at www.dep.state.fl.us/air by clicking on "permitting" and then on "construction permits." Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call (850) 488-0114 for additional information.

Golder Associates Inc.

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



August 17, 2000

0037523

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Office of General Council

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

Dear : Ms. Teri Donaldson

This correspondence is submitted on behalf of Nailite International, Inc. (Nailite). The draft permit was issued on August 4, 2000 and received on August 7, 2000. Nailite has received a draft permit regarding the installation of a new panel spray coating line. In addition, Nailite has agreed in concept to connect an existing panel coating line to new pollution control equipment being installed. The specific permit conditions regarding technical aspects of the new coating and existing lines require further discussions with the FDEP staff.

As a result, a 60-day extension to file an administrative hearing pursuant to 120.569 and 120.57 F.S. is requested. The request has been discussed with the Department's permitting staff and they indicated no problem with granting the extension.

Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

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

Benny Susi, P.E.
Assoicate

BS/jkw

cc: David Steedman, Nailite International, Inc.
A.A. Linero, FDEP BAR

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