Golder Associates Inc.
5100 West Lemon Street
Suite 114
Tampa, FL USA 33609
Telephone: (813) 287-1717
Fax: (813) 287-1716

April 11, 2005

043-9535

Miami-Dade County Environmental Resources Management (DERM)
Air Quality Management Division
33 S.W. 2nd Avenue
Suite 900
Miami, Florida 33130-1540

Attn: Air Permitting Administrator

RE: AIR PERMIT REVISION APPLICATION
NAILITE INTERNATIONAL, INC.
1111 NW 165TH STREET
MIAMI, FLORIDA
PERMIT NUMBER: 0250407-008-AC

Dear Air Permitting Administrator:

On behalf of Nailite International, Inc. (Nailite), Golder Associates Inc. (Golder) is pleased to submit 4 copies of the Air Permit Revision application to incorporate the conditions in Air Construction Permit No. 0250407-008-AC. Should you have any questions regarding this submittal, please contact either the facility or the undersigned.

Sincerely,

GOLDER ASSOCIATES INC

Renee Weaver, P.E.
Project Engineer

Scott McCann, P.E.
Associate

Attachments:
Table of Contents
Air Revision Application

cc: Mr. Al Linero, FDEP-Tallahassee
Mr. Kevin Martin, Nailite International, Inc.

REW/SAM/dcg

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Department of Environmental Protection

Division of Air Resource Management

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BUREAU OF AIR REGULATION

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: **Nailite International, Inc.**	
2. Site Name: **Nailite International, Inc.**	
3. Facility Identification Number: **0250407**	
4. Facility Location... Street Address or Other Locator: **1111 NW 165th Street** City: **Miami** County: **Miami-Dade** Zip Code: **33169**	
5. Relocatable Facility? ☐ Yes ☒ No	6. Existing Title V Permitted Facility? ☒ Yes ☐ No

Application Contact

1. Application Contact Name: **John Perry, Vice President of Operations**
2. Application Contact Mailing Address: Organization/Firm: **Nailite International, Inc.** Street Address: **1111 NW 165th Street** City: **Miami** State: **Florida** Zip Code: **33169**
3. Application Contact Telephone Numbers: Telephone: **(305) 620 - 6200** ext. Fax: **(305) 623 – 8227**
4. Application Contact Email Address: **jperry@nailite.com**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Project Number(s):	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

☐ Air construction permit.

Air Operation Permit

☐ Initial Title V air operation permit.

☒ Title V air operation permit revision.

☐ Title V air operation permit renewal.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

☐ Air construction permit and Title V permit revision, incorporating the proposed project.

☐ Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

The purpose of this application is to obtain a REVISION to the existing Title V Air Operating Permit No. 0250407-006-AV to incorporate the conditions of Air Construction Permit No. 0250407-008-AC.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	No. 1 Line : Three paint spray booths, two touch-up booths, and a gas-fired curing oven	N/A	N/A
002	Injection molding machines/oil tanks	N/A	N/A
003	Storage silos equipped with vacuum pump/filter systems	N/A	N/A
004	No. 2 Line : Three paint spray booths and an electric convection curing oven	N/A	N/A

Application Processing Fee

Check one: ☐ Attached - Amount: $_____ ☒ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: ext. Fax:

4. Owner/Authorized Representative Email Address:

5. Owner/Authorized Representative Statement:

I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.

_____ _____

Signature Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: **John Perry, Vice President of Operations**

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

   [x] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

   [ ] For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

   [ ] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

   [ ] The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm: **Nailite International, Inc.**
   Street Address: **1111 NW 165th Street**
   City: **Miami** State: **Florida** Zip Code: **33169**

4. Application Responsible Official Telephone Numbers...
   Telephone: **(305) 620 - 6200** ext. Fax: **(305) 623 – 8227**

5. Application Responsible Official Email Address: **jperry@nailite.com**

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

John Perry
Signature

April 7th, 2005
Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Scott A. McCann, P.E.**
   Registration Number: **54172**
2. Professional Engineer Mailing Address...
   Organization/Firm: **Golder Associates Inc.****
   Street Address: **6241 N.W. 23rd Street, Suite 500**
   City: **Gainesville** State: **Florida** Zip Code: **32653-1500**
3. Professional Engineer Telephone Numbers...
   Telephone: **(352) 336-5600** ext. Fax: **(352) 336-6603**
4. Professional Engineer Email Address: **smccann@golder.com**
5. 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.

(3) If the purpose of this application is to obtain a Title V 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 plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit revision (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal 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.

*(5) If the purpose of this application is to obtain an initial air operation permit or **operation permit revision** or renewal 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: 4/7/05

(seal) 4/7/05

* Attach any exception to certification statement.

****Board of Professional Engineers Certificate of Authorization #00001670**

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 13**	
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **30**	6. Facility SIC(s): **3089**
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: **Mr. John Perry**
2. Facility Contact Mailing Address... Organization/Firm: **Nailite International, Inc.** Street Address: **1111 NW 165th Street** City: **Miami** County: **Miami-Dade** Zip Code: **33169**
3. Facility Contact Telephone Numbers: Telephone: **(305) 620 - 6200** ext. Fax: **(305) 623 – 8227**
4. Facility Contact Email Address: **jperry@nailite.com**

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. ☐ Small Business Stationary Source	☐ Unknown
2. ☐ Synthetic Non-Title V Source	
3. [x] Title V Source	
4. [x] Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. ☐ Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. [x] Major Source of Hazardous Air Pollutants (HAPs)	
7. ☐ Synthetic Minor Source of HAPs	
8. ☐ One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. ☐ One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. [x] One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. ☐ Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: **The facility is a synthetic minor source with respect to PSD. A facility-wide VOC emissions limit of 249 tons per consecutive 12 months was requested and incorporated into Air Construction Permit No. 0250407-006-AV.** **The facility is subject to the MACT Subpart PPPP, finalized on April 19, 2004. The facility is considered an existing source and has until April 19, 2007 to comply with the MACT standard.**	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
VOCs	**A**	**Y**
HAPS	**A**	**N**
H169	**A**	**N**

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID Nos. Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
VOC	**Y**			**249**	**ESCPSD**

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

The emissions CAP was requested in the Air Construction Permit Application, dated June 15, 2004, to revise Permit No. 0250407-005-AC. The revised Air Construction Permit no. 0250407-008-AC, issued March 14, 2005, established a facility VOC emission limit of 249 tons per year to escape PSD applicability.

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:____ [x] Previously Submitted, Date: **November 2002 Title V Permit Renewal Application**

2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   ☐ Attached, Document ID:____ [x] Previously Submitted, Date: **November 2002 Title V Permit Renewal Application and June 15, 2004 Air Construction Application**

3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
   [x] Attached, Document ID: **NAI-FI-C3** ☐ Previously Submitted, Date:

Additional Requirements for Air Construction Permit Applications-N/A

1. Area Map Showing Facility Location:
   ☐ Attached, Document ID:____ ☐ Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification:
   ☐ Attached, Document ID:____
3. Rule Applicability Analysis:
   ☐ Attached, Document ID:____
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.):
   ☐ Attached, Document ID:____ ☐ Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):
    ☐ Attached, Document ID:____ ☐ Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications-N/A

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
   ☐ Attached, Document ID:_____ ☐ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities (Required for initial/renewal applications only):
   [x] Attached, Document ID: **NAI-FI-CV1*** ☐ Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):
   [x] Attached, Document ID: **NAI-FI-CV2**
   ☐ Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):
   [x] Attached, Document ID: **NAI-FI-CV3**
   Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):
   ☐ Attached, Document ID:_____
   ☐ Equipment/Activities On site but Not Required to be Individually Listed
   [x] Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :
   ☐ Attached, Document ID:_____ [x] Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
   ☐ Attached, Document ID: [x] Not Applicable

Additional Requirements Comment

***Although Attachment NAI-FI-CV1 is not required for revision applications, information regarding the redesignation of EU 002 and EU 003 as regulated status to insignificant status is provided.**

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION
Section [1]-EU 001 Paint Line No. 1.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

[x] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[x] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
No. 1 line: 3 spray booths, 2 touch-up booths, and a gas-fired curing oven.

3. Emissions Unit Identification Number: **001**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A			**30**	[ ] Yes [x] No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:
Emissions from the No. 1 line are vented to the RTO. Fugitive emissions include flash-off from the product conveyer system and other associated solvent transfer equipment.

EMISSIONS UNIT INFORMATION
Section [1]-EU 001 Paint Line No. 1.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

- Panel Filters (code 058)
- RTO (code 131)
- Higher Solids Paints (with lower solvent content) (code 102)
- Fluid Line Improvements (regulator modifications & line re-configurations) (code 099- miscelanneous control)
- Reciprocator Limit Switch Improvements (equates to less fugitive emissions per panel product) (code 099- miscellaneous control)
- Process enclosures (code 054)

- UV Curable Paint Use (Under engineering study at present)
- Non-Painted Panels (Under engineering study at present)

2. Control Device or Method Code(s): **058, 131, 102, 099, 054**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **254,800 gallons**	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr :	
4. Maximum Incineration Rate: pounds/hr : tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8,760** hours/year

6. Operating Capacity/Schedule Comment:
Maximum throughput rate based on limitation in Title V Operating Permit No. 0250407-006-AV, Condition A.1.

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **EU 001 and RTO stack**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Both **Emissions from the No. 1 line are vented to the RTO. Fugitive emissions include flash-off from the product conveyer system and other associated solvent transfer equipment.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Emissions from EU 002 also vent to the same RTO.**		
5. Discharge Type Code: **V**	6. Stack Height: **30 feet**	7. Exit Diameter: **3.67 feet**
8. Exit Temperature: **229 °F**	9. Actual Volumetric Flow Rate: **27,000 acfm**	10. Water Vapor: %:
11. Maximum Dry Standard Flow Rate: **2,000 dscfm**	12. Nonstack Emission Point Height: feet:	
13. Emission Point UTM Coordinates... : Zone: East (km): North (km):	14. Emission Point Latitude/Longitude...: Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Stack parameters represent RTO specifications.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): **Petroleum and Solvent Evaporation** **-Surface Coating Operations** **--Plastic Parts** **---Coating Operation**		
2. Source Classification Code (SCC): **4-02-022-01**	3. SCC Units: **Tons solvent in coating used**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate: **254,800**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **254,800 represents the permit limit in gallons of surface coating per line.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): **Petroleum and Solvent Evaporation** **-Surface Coating Operations** **--Fuel Fired Equipment** **---Natural Gas Incinerator/Afterburner**		
2. Source Classification Code (SCC): **4-02-900-13**	3. SCC Units: **MMCF**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1056**
Segment Comment: **Natural gas is used as a supplemental fuel.** **Fuel heat content represents average based on 2004 operating data.**		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	**131**	**58**	**EL**

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control: **≥97% destruction, ≥70% capture**
3. Potential Emissions: lb/hour **249 tons/year**	4. Synthetically Limited? [x] Yes [ ] No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**

8. Calculation of Emissions:

Control Efficiency based on Permit Condition (Permit No. 0250407-008-AC).

Potential emissions reflect facility wide emissions and are based on a Permit limit (Permit No. 0250407-008-AC). Permit also limits facility wide VOC emissions to 30 tons during any single month. Additionally, per Permit Condition 6, Section III, the maximum amount of VOC contained in all coatings, thinners and/or other additives, and cleaning materials used in the coating operation facility wide shall not exceed 1,000 tons per consecutive 12-month period.

Emissions are calculated using a mass-balance approach.

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions of **1 of 1**

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **249 tons/year**	4. Equivalent Allowable Emissions: lb/hour **249 tons/year**
5. Method of Compliance: **Record Keeping and Mass Balance Calculations**	
6. Allowable Emissions Comment (Description of Operating Method): **Allowable emissions based on facility wide Permit limit (Permit No. 0250407-008-AC). Permit also limits facility wide VOC emissions to 30 tons during any single month.**	

Allowable Emissions Allowable Emissions __ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **1 of 1**

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [x] Rule [ ] Other
3. Allowable Opacity: Normal Conditions: **20%** Exceptional Conditions: Maximum Period of Excess Opacity Allowed:	
4. Method of Compliance: **EPA Method 9, upon agency request**	
5. Visible Emissions Comment: **Not requested by applicant, but specified by general Rule 62-296.320 (4)(b)1.**	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor **1 of 1**

1. Parameter Code: **Combustion Temperature**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information: Manufacturer: **Honeywell** Model Number: **EZ Trend D5**	Serial Number: **0501Y565426900002**
5. Installation Date: **April 2005**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Per Permit No. 0250407-008-AC, Section III, Condition 3, monitoring of the combustion temperature within the thermal incinerator is required. Facility has recently replaced existing paper chart temperature recorder, which was initially installed in 2000 as an integrated component of the RTO, with a Honeywell thermocouple and digital data logger.**	

Continuous Monitoring System: Continuous Monitor of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
☐ Attached, Document ID: _ [x] Previously Submitted, Date **November 2002 Title V Permit Renewal Application and June 15, 2004 Air Construction Application**

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
[x] Attached, Document ID: **NAI-EU1-I2** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
☐ Attached, Document ID: [x] Previously Submitted, Date **November 2002 Title V Permit Renewal Application and June 15, 2004 Air Construction Application**

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
[x] Attached, Document ID: **NAI-EU1-I4** ☐ Previously Submitted, Date ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
[x] Attached, Document ID: **NAI-EU1-I5** ☐ Previously Submitted, Date ☐ Not Applicable

6. Compliance Demonstration Reports/Records
☐ Attached, Document ID: _____
Test Date(s)/Pollutant(s) Tested: _____
[x] Previously Submitted, Date: _
Test Date(s)/Pollutant(s) Tested: **RTO efficiency (capture and destruction) testing conducted March 11-12, 2004. Test Report submitted April 9, 2004.**
☐ To be Submitted, Date (if known):
Test Date(s)/Pollutant(s) Tested: _____
☐ Not Applicable

Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute
☐ Attached, Document ID: [x] Not Applicable

EMISSIONS UNIT INFORMATION
Section [1]-EU 001 Paint Line No. 1.

Additional Requirements for Air Construction Permit Applications-N/A

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID:_____ ☐ Not Applicable

2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☐ Not Applicable

3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☒ Attached, Document ID: **NAI-FI-CV2**

2. Compliance Assurance Monitoring
   ☒ Attached, Document ID: **NAI-EU1-IV2** ☐ Not Applicable

3. Alternative Methods of Operation
   ☒ Attached, Document ID: **NAI-EU1-IV3** ☐ Not Applicable

4. Alternative Modes of Operation (Emissions Trading)
   ☒ Attached, Document ID: **NAI-EU1-IV4** ☐ Not Applicable

5. Acid Rain Part Application
   ☐ Certificate of Representation (EPA Form No. 7610-1)
      ☐ Copy Attached, Document ID:
   ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
      ☐ Attached, Document ID:_____
      ☐ Previously Submitted, Date:_____
   ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
      ☐ Attached, Document ID:_____
      ☐ Previously Submitted, Date:_____
   ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
      ☐ Attached, Document ID:_____
      ☐ Previously Submitted, Date:_____
   ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
      ☐ Attached, Document ID:_____
      ☐ Previously Submitted, Date:_____
   ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
      ☐ Attached, Document ID:_____
      ☐ Previously Submitted, Date:_____
   ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
      ☐ Attached, Document ID:_____
      ☐ Previously Submitted, Date:_____
   ☒ Not Applicable

Additional Requirements Comment

This application includes Attachment NAI-EU1-IV2, which evaluates the applicability of CAM. The result of the evaluation indicates that the facility is currently subject to the CAM requirements. The CAM plan will follow under separate cover.

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION
Section [2]-EU 004 Paint Line No. 2.

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

[x] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[x] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
No. 2 line: 3 spray booths and an electric curing oven.

3. Emissions Unit Identification Number: **004**

4. Emissions Unit Status Code:	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
A			**30**	[ ] Yes [x] No

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

Emissions from the No. 2 line are vented to the RTO. Fugitive emissions include flash-off from the product conveyer system and other associated solvent transfer equipment.

EMISSIONS UNIT INFORMATION
Section [2]-EU 004 Paint Line No. 2.

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

- Panel Filters (code 058)
- RTO (code 131)
- Higher Solids Paints (with lower solvent content) (code 102)
- Fluid Line Improvements (regulator modifications & line re-configurations) (code 099-miscelanneous control)
- Reciprocator Limit Switch Improvements (equates to less fugitive emissions per panel product) (code 099-miscelanneous control)
- Process enclosures (code 054)

- UV Curable Paint Use (Under engineering study at present)
- Non-Painted Panels (Under engineering study at present)

2. Control Device or Method Code(s): **058, 131, 102, 099, 054**

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: **254,800 gallons**	
2. Maximum Production Rate:	
3. Maximum Heat Input Rate: million Btu/hr :	
4. Maximum Incineration Rate: pounds/hr : tons/day	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8,760** hours/year
6. Operating Capacity/Schedule Comment: **Maximum throughput rate based on limitation in Title V Operating Permit No. 0250407-006-AV, Condition A.1.**	

C. EMISSION POINT (STACK/VENT) INFORMATION
(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **EU 004 and RTO stack**	2. Emission Point Type Code: **1**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Both **Emissions from the No. 2 line are vented to the RTO. Fugitive emissions include flash-off from the product conveyer system and other associated solvent transfer equipment.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Emissions from EU 001 also vent to the same RTO.**		
5. Discharge Type Code: **V**	6. Stack Height: **30 feet**	7. Exit Diameter: **3.67 feet**
8. Exit Temperature: **229 °F**	9. Actual Volumetric Flow Rate: **27,000 acfm**	10. Water Vapor: %:
11. Maximum Dry Standard Flow Rate: **2,000 dscfm**	12. Nonstack Emission Point Height: feet:	
13. Emission Point UTM Coordinates... : Zone: East (km): North (km):	14. Emission Point Latitude/Longitude...: Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: **Stack parameters represent RTO specifications.**		

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment **1** of **2**

1. Segment Description (Process/Fuel Type): **Petroleum and Solvent Evaporation** **-Surface Coating Operations** **--Plastic Parts** **---Coating Operation**		
2. Source Classification Code (SCC): **4-02-022-01**	3. SCC Units: **Tons solvent in coating used**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate: **254,800**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: **254,800 represents the permit limit in gallons of surface coating per line.**		

Segment Description and Rate: Segment **2** of **2**

1. Segment Description (Process/Fuel Type): **Petroleum and Solvent Evaporation** **-Surface Coating Operations** **--Fuel Fired Equipment** **---Natural Gas Incinerator/Afterburner**		
2. Source Classification Code (SCC): **4-02-900-13**	3. SCC Units: **MMCF**	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1056**
Segment Comment: **Natural gas is used as a supplemental fuel.** **Fuel heat content represents average based on 2004 operating data.**		

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	**131**	**58**	**EL**

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: **VOC**	2. Total Percent Efficiency of Control: **≥97% destruction, ≥90% capture**
3. Potential Emissions: lb/hour **249 tons/year**	4. Synthetically Limited? [x] Yes [ ] No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference:	7. Emissions Method Code: **0**

8. Calculation of Emissions:

Control Efficiency based on Permit Condition (Permit No. 0250407-008-AC).

Potential emissions reflect facility wide emissions and are based on a Permit limit (Permit No. 0250407-008-AC). Permit also limits facility wide VOC emissions to 30 tons during any single month. Additionally, per Permit Condition 6, Section III, the maximum amount of VOC contained in all coatings, thinners and/or other additives, and cleaning materials used in the coating operation facility wide shall not exceed 1,000 tons per consecutive 12-month period.

Emissions are calculated using a mass-balance approach.

9. Pollutant Potential/Estimated Fugitive Emissions Comment:

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions of **1 of 1**

1. Basis for Allowable Emissions Code: **ESCPSD**	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: **249 tons/year**	4. Equivalent Allowable Emissions: lb/hour **249 tons/year**
5. Method of Compliance: **Record Keeping and Mass Balance Calculations**	
6. Allowable Emissions Comment (Description of Operating Method): **Allowable emissions based on facility wide Permit limit (Permit No. 0250407-008-AC). Permit also limits facility wide VOC emissions to 30 tons during any single month.**	

Allowable Emissions Allowable Emissions __ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **1 of 1**

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [x] Rule [ ] Other
3. Allowable Opacity: Normal Conditions: **20%** Exceptional Conditions: Maximum Period of Excess Opacity Allowed:	
4. Method of Compliance: **EPA Method 9, upon agency request**	
5. Visible Emissions Comment: **Not requested by applicant, but specified by general Rule Florida Administrative Code (F.A.C.), 62-296.320 (4)(b)1.**	

Visible Emissions Limitation: Visible Emissions Limitation ___ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor **1 of 1**

1. Parameter Code: **Combustion Temperature**	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☒ Other
4. Monitor Information: Manufacturer: **Honeywell** Model Number: **EZ Trend D5**	Serial Number: **0501Y565426900002**
5. Installation Date: **April 2005**	6. Performance Specification Test Date:
7. Continuous Monitor Comment: **Per Permit No. 0250407-008-AC, Section III, Condition 3, monitoring of the combustion temperature within the thermal incinerator is required. Facility has recently replaced existing paper chart temperature recorder, which was initially installed in 2000 as an integrated component of the RTO, with a Honeywell thermocouple and digital data logger.**	

Continuous Monitoring System: Continuous Monitor of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	☐ Rule ☐ Other
4. Monitor Information... Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION
Section [2]-EU 004 Paint Line No. 2.

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
☐ Attached, Document ID: ____ [x] Previously Submitted, Date **November 2002 Title V Permit Renewal Application and June 15, 2004 Air Construction Application**

2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
[x] Attached, Document ID: **NAI-EU1-I2** ☐ Previously Submitted, Date _____

3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
☐ Attached, Document ID: ____ [x] Previously Submitted, Date **November 2002 Title V Permit Renewal Application and June 15, 2004 Air Construction Application**

4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
[x] Attached, Document ID: **NAI-EU1-I4** ☐ Previously Submitted, Date ☐ Not Applicable (construction application)

5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)
[x] Attached, Document ID: **NAI-EU1-I5** ☐ Previously Submitted, Date ☐ Not Applicable

6. Compliance Demonstration Reports/Records
☐ Attached, Document ID: _____
Test Date(s)/Pollutant(s) Tested: _____
[x] Previously Submitted, Date: _
Test Date(s)/Pollutant(s) Tested: **RTO efficiency (capture and destruction) testing conducted March 11-12, 2004. Test Report submitted April 9, 2004.**
☐ To be Submitted, Date (if known):
Test Date(s)/Pollutant(s) Tested: _____
☐ Not Applicable

Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7. Other Information Required by Rule or Statute
☐ Attached, Document ID: [x] Not Applicable

EMISSIONS UNIT INFORMATION
Section [2]-EU 004 Paint Line No. 2.

Additional Requirements for Air Construction Permit Applications-N/A

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
   ☐ Attached, Document ID:_____ ☐ Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
   ☐ Attached, Document ID: _____ ☐ Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
   ☐ Attached, Document ID: _____ ☐ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements
   ☒ Attached, Document ID: **NAI-FI-CV2**
2. Compliance Assurance Monitoring
   ☒ Attached, Document ID: **NAI-EU1-IV2** ☐ Not Applicable
3. Alternative Methods of Operation
   ☒ Attached, Document ID: **NAI-EU1-IV3** ☐ Not Applicable
4. Alternative Modes of Operation (Emissions Trading)
   ☒ Attached, Document ID: **NAI-EU1-IV4** ☐ Not Applicable
5. Acid Rain Part Application
   - ☐ Certificate of Representation (EPA Form No. 7610-1)
     - ☐ Copy Attached, Document ID:
   - ☐ Acid Rain Part (Form No. 62-210.900(1)(a))
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☐ Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
     - ☐ Attached, Document ID:_____
     - ☐ Previously Submitted, Date:_____
   - ☒ Not Applicable

Additional Requirements Comment

This application includes Attachment NAI-EU1-IV2, which evaluates the applicability of CAM. The result of the evaluation indicates that the facility is currently subject to the CAM requirements. The CAM plan will follow under separate cover.

FACILITY ATTACHMENTS

NAI-FI-C3

Precautions to Prevent the Emissions of Unconfined Particulate Matter

Golder Associates

ATTACHMENT NAI-FI-C3

PRECAUTIONS TO PREVENT THE EMISSIONS OF UNCONFINED PARTICULATE MATTER

Predominantly, facility operations are enclosed with the facility building; therefore the facility has negligible amounts of unconfined particulate matter. Operations that occur outside of the building are also considered to be negligible sources of particulate matter. A summary of outdoor activities is provided in the table below.

POTENTIAL SOURCE	PRECAUTIONS TO PREVENT PM EMISSIONS
Unloading of polypropylene pellets to silos.	Silo equipped with vacuum pump/filter system.
General travel of heavy vehicles for loading/offloading activities.	Maintenance of paved areas as needed.
Weather influences on facility property.	Landscaping and maintenance of vegetation.

NAI-FI-CV1

Insignificant Activities

Golder Associates

ATTACHMENT NAI-FI-CV1

LIST OF INSIGNIFICANT UNITS

The emission units listed below represent units that have been redesignated from a regulated emission unit to an insignificant status under rule 62-210.300(3), Florida Administrative Code (F.A.C.), per Air Construction Permit No. 0250407-008-AC.

UNIT ID	DESCRIPTION
002	Injection Molding Machines/Oil Tanks
003	Storage Silos equipped with vacuum pump/filter systems

Additional insignificant activities exist at the facility and are listed in Air Operating Permit (renewal) No. 0250407-006-AV.

NAI-FI-CV2

Identified Applicable Requirements

Golder Associates

ATTACHMENT NAI-FI-CV2

LIST OF IDENTIFIED APPLICABLE REQUIREMENTS

Title V Core List **Effective: 03/25/97**

[**Note:** The Title V Core List is intended to simplify the completion of the "List of Applicable Regulations" that apply facility-wide (see Subsection II.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.

Requirements that apply to emissions units must be identified in Subsection III.B. of DEP Form No. 62-210.900(1), Application for Air Permit - Long Form.

Applicants must identify all "applicable requirements" in order to claim the "permit shield" described at Rule 62-213.460, F.A.C.]

Federal: ***(description)***

40 CFR 63 Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products **(Facility has until April 19, 2007 to comply)**
40 CFR 61, Subpart M: NESHAP for Asbestos.
40 CFR 82: Protection of Stratospheric Ozone.
40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).
40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: ***(description)***

CHAPTER 62-4, F.A.C.: PERMITS, effective 10-16-95

62-4.030, F.A.C.: General Prohibition.
62-4.040, F.A.C.: Exemptions.
62-4.050, F.A.C.: Procedure to Obtain Permits; Application
62-4.060, F.A.C.: Consultation.
62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.
62-4.080, F.A.C.: Modification of Permit Conditions.
62-4.090, F.A.C.: Renewals.
62-4.100, F.A.C.: Suspension and Revocation.
62-4.110, F.A.C.: Financial Responsibility.
62-4.120, F.A.C.: Transfer of Permits.
62-4.130, F.A.C.: Plant Operation - Problems.
62-4.150, F.A.C.: Review
62-4.160, F.A.C.: Permit Conditions.
62-4.210, F.A.C.: Construction Permits.
62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-103, F.A.C.: RULES OF ADMINISTRATIVE PROCEDURE, effective 12-31-95

62-103.150, F.A.C.: Public Notice of Application and Proposed Agency Action.
62-103.155, F.A.C.: Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 03-21-96

62-210.300, F.A.C.: Permits Required.
62-210.300(1), F.A.C.: Air Construction Permits.
62-210.300(2), F.A.C.: Air Operation Permits.
62-210.300(3), F.A.C.: Exemptions.
62-210.300(3)(a), F.A.C.: Full Exemptions.
62-210.300(3)(b), F.A.C.: Temporary Exemption.
62-210.300(5), F.A.C.: Notification of Startup.
62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.

62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.

62-210.650, F.A.C.: Circumvention.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1) Application for Air Permit - Long Form, Form and Instructions.
62-210.900(5) Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 03-20-96

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1) Major Air Pollution Source Annual Emissions Fee Form, Form and Instructions.

CHAPTER 62-256, F.A.C.: OPEN BURNING AND FROST PROTECTION FIRES, effective 11-30-94

CHAPTER 62-257, F.A.C: ASBESTOS NOTIFICATION AND FEE, effective 03/24/96

CHAPTER 62-281, F.A.C: MOTOR VEHICLE AIR CONDITIONING REFRIGERANT RECOVERY AND RECYCLING, EFFECTIVE 03-07-96

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, EFFECTIVE 03-13-96

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.
62-296.320(3), F.A.C.: Industrial, Commercial, and Municipal Open Burning Prohibited
62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter

NAI-FI-CV3

Compliance Report and Plan

Golder Associates

ATTACHMENT NAI-FI-CV3
COMPLIANCE REPORT AND PLAN

Based on a compliance evaluation conducted to prepare the 2004 Statement of Compliance (submitted in February 2005) the facility is in compliance with all currently applicable air regulations, air permits, and agreements referenced in this application. Although items of non-compliance were noted in the 2004 Statement of Compliance, the revision to the Air Construction Permit, issued March 14, 2005, revised permit conditions of which the facility is now in compliance with.

COMPLIANCE CERTIFICATION

"I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete."

John Perry
V.P. of Operations
Nailite International, Inc.

April 7th, 2005
Date

EMISSION UNIT ATTACHMENTS

EU 001 (NO. 1 PAINT LINE)
AND
EU 004 (NO. 2 PAINT LINE)

NAI-EU1-I2

Fuel Specification

Golder Associates

ATTACHMENT NAI-EU1-I2
FUEL SPECIFICATIONS

EU 001 and EU 004

The primary fuel firing the Regenerative Thermal Oxidation (RTO) unit is the captured solvent from the process materials. Natural gas is used at start-up as a secondary fuel. The RTO uses ceramic materials to store a large thermal mass generated by the thermal incinerator and then uses the fuel value of the inlet gas stream to maintain the incineration process.

Solvent

The solvent consists of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) (primarily toluene and xylene). Based on design performance specifications the inlet solvent concentration may range between 123 lb/hr to 366 lb/hr.

Natural Gas

Based on 2004 operating data, the average heating value of the natural gas is 1056 MMBtu/MMCF.

NAI-EU1-I4

Procedures for Start-Up and Shut-Down

Golder Associates

NAILITE DOCUMENT NUMBER	REVISION	PAGE
NWI-OPERS-0001	-	1 OF 5

RTO STARTUP AND SHUTDOWN

Prepared By:	Kevin Martin	**Date**	**Title**
Approved By:	*Kevin S. Martin*	*9/17/02*	**Senior Manufacturing Engineer**
	James A. Chakkalakal	*9/16/02*	**Plant Manager**
	Johnny Pong	*9/16/02*	**Director of Quality & Process Control**
	J.Perry	*9/17/02*	**Vice President of Operations**

Effective Date:	September 17, 2002

REVISION HISTORY

REVISION	DESCRIPTION	EFFECTIVE DATE	APPROVALS (Initials Only)
-	Initial Release	9-17-02	KM, JC, JP, JP

APPLICABLE DOCUMENTS

DOCUMENT NUMBER	TITLE OF DOCUMENT

PURPOSE

The purpose of this work instruction is to provide a detailed description of how to start up and shut down the RTO as well prepare the unit for cool-down mode.

Start-Up of RTO

1. Check to see that the main power switch is in the "on" position. (Figure 1.)
2. Open gas line valve labeled "Main Gas Valve". (Figure 2)
3. Reset emergency stop and reset faults if necessary. (Figure 1)
4. Place the operator enable key in the ON position. (Figure 1.)
5. Turn the mode select switch to the START position (Figure 1). This is momentary position switch and will spring back to RUN. This will initiate the system sequence of events.
6. The first mode in the system sequence is the "Purge" mode.

7. Once all safety interlock permissives are satisfied *and* the permissive fault indicator light is off the flame safeguard will continue "Purge Mode" for an additional 4 minutes.

8. Upon completion of "Purge" mode the unit will begin "Heat Up" mode.

9. Once the flame detector has detected the presence of a flame " Heat Up" mode will continue until the combustion chamber temperature reaches 1700 F.

10. After the unit reaches its set point at 1700 F, the unit then goes into "Soak" mode for an hour. An oxidizer ready signal will be initiated approximately 30 minutes into the soak cycle and the unit will then be ready to accept process fumes.

11. The unit will achieve "Run" mode after one hour of soak is completed.

Shut dw of RTO

1. Turn the "Mode Select" switch on the control panel to the position labeled as SHUTDOWN or STOP.

2. Close gas valve labeled "Main Gas Valve".

Cool dw of RTO

1. Shut unit down.

2. Power down unit.

3. Open Control Panel

4. Remove Honeywell Burner Control Relay. Note: This is a large blue box with a smaller interface snapped to it. The interface has 2 wires going to it. The interface must stay in the unit-leave it connected. Remove the blue box (This will require a small slotted screwdriver)

5. Close control panel.

6. Turn main power switch back on.

7. Reset appropriate faults
8. Toggle Mode switch to "Start".
9. System will then begin to cycle ambient air through beds.
10. Cool-down should take about 12 hours.

FIGURE 1 - RTO CONTROL PANEL

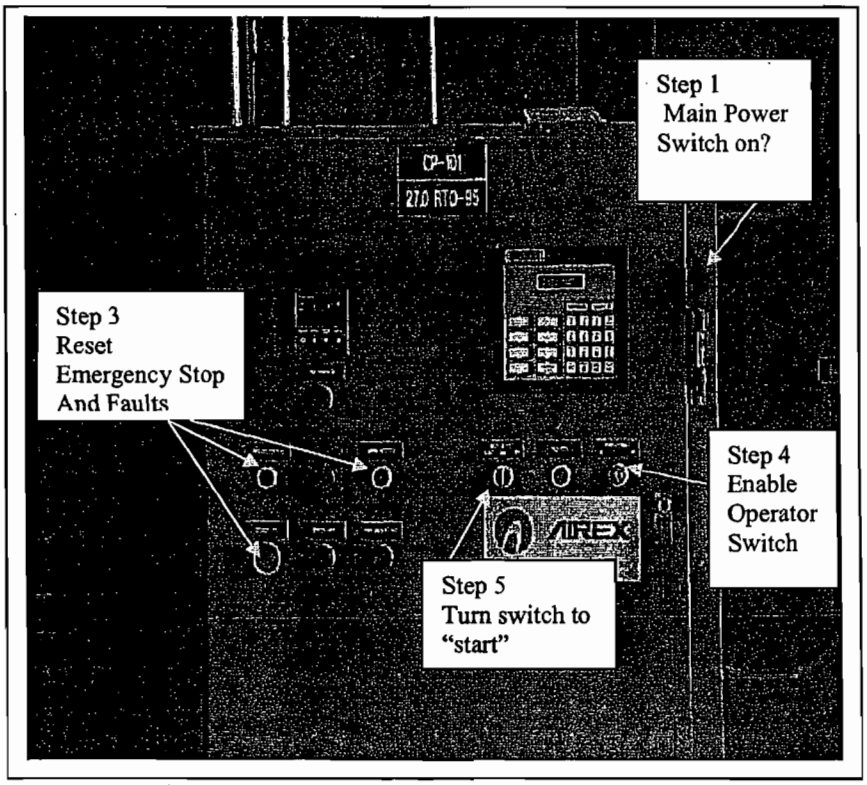
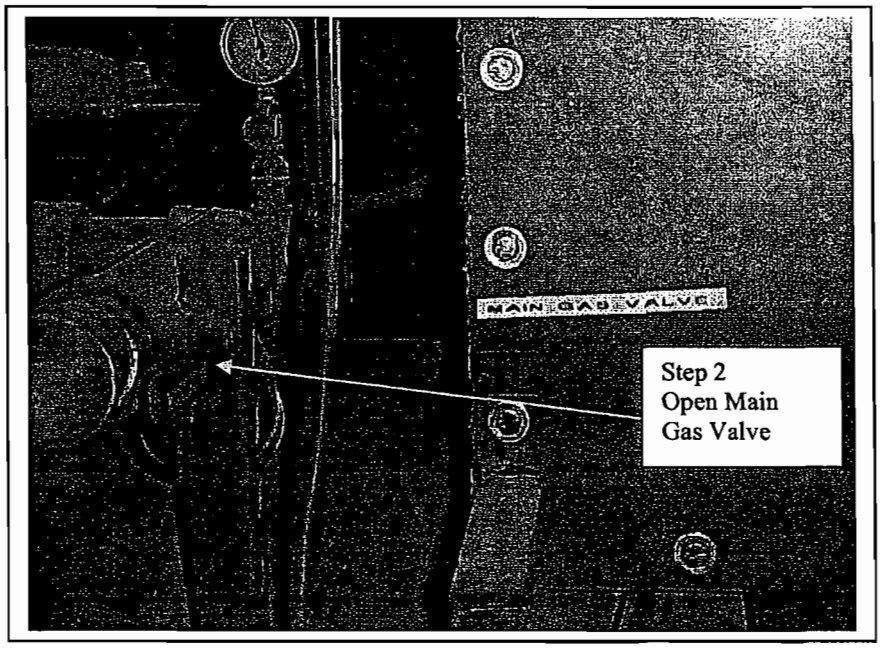


FIGURE 2 - MAIN GAS VALVE



NAI-EU1-I5

Operation and Maintenance Plan

Golder Associates

ATTACHMENT NAI-EU1-I5
OPERATION AND MAINTENANCE PLAN

EU 001 and EU 004

The facility currently maintains an outside contractor to conduct annual preventative maintenance inspections on the paint lines and Regenerative Thermal Oxidizer (RTO). The inspections include diagnostic tests. Based on the results of the inspection, repairs are conducted as necessary.

In addition to the annual inspections, facility personnel monitor the operations of the paint lines and RTO and conduct repairs, as necessary. Spare parts are kept in stock to make the repairs. Repairs that exceed the capability of facility personnel are conducted by a contractor.

NAI-EU1-IV2

CAM Applicability

Golder Associates

ATTACHMENT NAI-EU1-IV2
CAM APPLICABILITY

EU 001 and EU 004

EU 001 (no. 1 paint line) and EU 004 (no. 2 paint line) are currently subject to the Compliance Assurance Monitoring (CAM) requirements. However, once the facility achieves compliance with the MACT Subpart PPPP, by April 19, 2007, the units would qualify for a CAM exemption.

Applicability Summary

40 CFR 64 (CAM Rule) applies to emissions units that meet the following conditions:

- the unit is located at a major source for which a Title V Permit is required; and
- the unit is subject to an emission limitation or standard (i.e. VOC emission limit); and
- the unit uses a control device to achieve compliance with a federally enforceable limit or standard (i.e. RTO); and
- the unit has potential pre-control or post-control emissions of at least 100% of the major source amount (i.e. > 100 tons per year VOC); and
- the unit is not otherwise exempt from CAM.

With the passage of the 1990 Clean Air Act Amendments, EPA incorporated "directly enforceable monitoring" into all emission regulations. In some cases, this monitoring is more stringent than the monitoring required under the CAM rule. Therefore, this rule does not apply to facilities that are subject to EPA regulations issued after 1990. The facility is currently subject to the MACT PPPP, which is a post 1990 regulation. However, the facility must achieve compliance with the MACT PPPP prior to claiming the CAM exemption. Based on the current compliance status of the units, the CAM rule currently applies to EU 001 and EU 004.

Both EU 001 and EU 004 are ducted to a common RTO. Therefore, the CAM plan will address the common RTO unit. A CAM plan for the Regenerative Thermal Oxidizer (RTO) for units EU 001 and EU 004 will follow under separate cover.

NAI-EU1-IV3

Alternative Methods of Operation

Golder Associates

ATTACHMENT NAI-EU1-IV3
ALTERNATIVE METHODS OF OPERATION

EU 001 and EU 004

There are no alternative methods of operation anticipated that would significantly affect air pollutant emissions from the facility. The primary activities of manufacturing and coating of plastic shingles molded from polypropylene pellets and all associated activities will continue as currently conducted or allowed by permit.

Two fuel segments have been identified for the Regenerative Thermal Oxidizer (RTO) used to control Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emissions from the paint lines. Captured solvent is the primary fuel and natural gas is the auxiliary fuel. Solvent quality will vary within a moderate range based on the characteristics of the applied coatings. Natural gas quality are not anticipated to experience much variability.

NAI-EU1-IV4

Alternative Modes of Operation

Golder Associates

ATTACHMENT NAI-EU1-IV4
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)

EU 001 and EU 004

There are no alternative modes of operation proposed for this facility or any of the emissions units at this facility. A facility-wide Volatile Organic Compounds (VOCs) emissions cap of 249 tons per year is specified in Permit No. 0250407-008-AC. No emission trading is requested.