



Memorandum

Florida Department of Environmental Protection

TO: Michael G. Cooke

THROUGH: Al Linero/Trina Vielhauer 

FROM: Cindy Mulkey 

DATE: March 9, 2005

SUBJECT: New Panel Spray Line - Final Limits
Construction Permit No. 0250407-008-AC
Nailite International, Inc. - Miami

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

In connection with Nailite's ongoing efforts to convert its process from spray coating to direct pigment injection, this revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules. However, this revision leaves Nailite's Maximum Achievable Control Technology (MACT) applicability unchanged. Under this revision, the PSD applicability threshold of 250 tons per year for the entire facility will not be exceeded, while the MACT applicability threshold of 10 tons per year of a single hazardous air pollutant (HAP) or 25 tons per year of total HAPs will be exceeded. This permit revision establishes capture and destruction values based on testing pursuant to the original permit. It also allows indefinite operation of the old No. 1 Line. The maximum production capacity of 300,000 gallons of paints and solvents per line per year shall remain the same as in the original permit.

Comments from the applicant were received during the public comment period and are included in the Final Determination. It is recommended that the permit be issued at this time.

Attachments

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

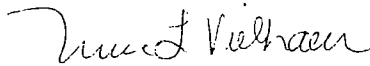
Mr. John Perry, VP Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

DEP File No. 0250407-008-AC
Final Limits Coating Lines No. 1 and No. 2
Miami-Dade County

Enclosed is the Final Air Construction Permit (0250407-008-AC) to establish collection and destruction efficiency values, remove the operational deadline for Line No. 1, and modify emission limits for volatile organic compounds at the above facility located at 1111 NW 165th Street in Miami. This permit replaces the previously issued Air Construction Permit (0250407-005-AC) for the same project. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

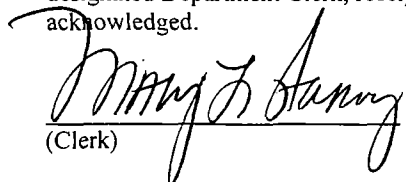
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT was sent by certified mail* and copies were mailed by U.S. Mail before the close of business on 3/14/05 to the person(s) listed:

John Perry, NII*
Jim Little, EPA
Bruce Offord, DEP SED
Mallika Muthiah, Miami-Dade DERM
Renee Weaver, P.E., Golder Associates
Scott McCann, P.E., Golder Associates

Clerk Stamp

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


(Clerk) 3/14/05
(Date)

FINAL DETERMINATION
File No. 0250407-008-AC
Nailite International, Inc., Miami-Dade County
Plastic Panel Manufacturing and Coating Facility

The Department distributed a Public Notice package on January 28, 2005 for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new (adjacent) location.

Final collection and destruction requirements (RACT) in compliance with the Southeast Florida Attainment Maintenance Plan for relocated Line 1 were determined for control by regenerative thermal oxidation (RTO) rather than by paint solvent content.

Final collection and destruction requirements for the RTO system were determined for Line 2 in compliance with the previously issued case-by-case Maximum Achievable Control Technology (MACT).

The Public Notice of Intent to Issue was published in the February 11th edition of the Miami Daily Business Review.

The only comments received during the 30-day comment period were from the applicant. These comments are recited or described below (*italics*) followed by the Department's responses.

Technical Evaluation and Preliminary Determination

1. *"Facility operations are described as vinyl siding manufacturing. Note that the facility does not use vinyl materials in the operations, but rather polypropylene. Reference to vinyl occurs on the cover page and page 4 of 10 Section III, Original Project and Photo 1. Delete the term vinyl and replace with polypropylene when describing the operations throughout permit documents."*

The applicant's comments have been duly noted.

2. *"Miami-Dade County is referred to as Dade County. This occurs on Page 2 of 10 Section II.A, Facility Location and Page 3 of 10 Section II.C Facility Category/Applicability. Replace Dade County with Miami-Dade County throughout permit documents."*

The applicant's comments have been duly noted.

3. *Historical emissions listed in the table presented in Section IV.A Continued Operation of Line No. 1; do not exactly match the numbers submitted in the Response to Verbal Request for Additional Information (RAI) dated October 15, 2004, as referenced. Slight discrepancies were noted.*

The following changes to the referenced table were requested:

2002 VOC emissions should be changed from 148 TPY to 147 TPY.
1999 HAP emissions should be changed from 334 TPY to 335 TPY.
2001 HAP emissions should be changed from 290 TPY to 286 TPY.
2003 HAP emissions should be changed from 128 TPY to 117 TPY.
2004 HAP emissions should be changed from 88 TPY to 89 TPY.

The applicant also requested that a reference to Line 1 & 2 be inserted for the 2004 values.

The applicant's comments have been duly noted. Re-issuance of the Technical Evaluation and Preliminary Determination is not required and the limits in this permit are not affected.

4. *Reference No. 3 includes a grammatical typo: Golder Associates Letter to FDEP, Response to Verbal Request for Additional Information, of October 15, 2004. This occurs on Page 10 of 10. Revise to: Golder Associated Letter to FDEP, Response to Verbal Request for Additional Information, October 15, 2004.*

The applicant's comments have been duly noted.

Permit

5. *"AC Permit Modification (0250407-008-AC) expires May 30, 2005. This may not be reasonable. Per the rule, an application for permit revision is required at least ninety days prior to expiration of the unit's air construction permit, but no later than 180 days after the emissions unit commences operation or commences operation as modified. (213-420(1)(a)4, F.A.C.). Revise the expiration date to July 31, 2005 to allow the facility sufficient time to prepare the Operating Permit Revision Application."*

The Department concurs. The Permit expiration date has been changed to July 31, 2005.

6. *"Section 1, Facility Information, Relevant Documents includes a grammatical typo: Departments request for additional information of August 2, 2004. This occurs on Page 3 of 11. Revise to: Departments request for additional information on August 2, 2004. Additionally, reference as a verbal request for additional information."*

Department's request for additional information of August 2, 2004 has been changed to:
Department's Verbal Request for Additional Information of August 2, 2004.

7. *"Section III, Emissions Units Specific Conditions, Emissions Unit Description. Since EU002 and EU003 were re-designated as insignificant, they should not be subject to or referenced in the emission unit specific condition section. Footnotes 1 and 2 are referenced, but do not appear in this section. This occurs on Page 9 of 11. Reference units in appropriate attachment of insignificant units and clarify reference to Footnotes 1 and 2."*

As pointed out by the applicant, emissions units EU002 and EU003 have been re-designated as insignificant emissions units. The units have been removed from the table on page 9 of the permit. References to footnotes 1 and 2 do not apply to the table on page 9 and have been removed.

8. *"Section III, Emissions Units Specific Conditions, Emissions Limiting and Performance Standards, No. 3 Control System Performance requires that when the emissions unit is in operation, the Regenerative Thermal Oxidizer (RTO) minimum 3-hr average combustion temperature shall not fall below 1700 degrees Fahrenheit (°F) and shall be maintained by using supplementary natural gas. This condition is presented on Page 9 of 11. Additionally, Condition No. 13 for Reporting and Record Keeping Requirements requires that the control efficiency be assumed as 0% for each 3-hour period of operation below the minimum RTO combustion temperature. It is requested that the 3-hour average minimum operating temperature be reduced to 1500 °F."*

The applicant provided with their comments documentation and arguments in support of this request. These include excerpts from the manufacturer's manual, and test data summaries. According to the manufacturer, supplemental fuel (natural gas) injection is used to maintain a bed temperature of approximately 1500 °F and an "average" combustion chamber temperature of 1700 °F. Complete combustion occurs when the ignition point is reached, typically 1500 °F to 1700 °F. The Department agrees that the required destruction efficiency can be attained with a lower temperature. Specific condition No. 3 has been modified as follows:

"The average combustion temperature within the thermal incinerator, for any 3-hour rolling average when the emissions unit is in operation, shall not fall below ~~1700~~ 1500 degrees F and shall be maintained by using supplementary natural gas."

9. *"Section III, Compliance Monitoring and Testing Requirements, No. 7 Destruction Efficiency of the RTO. A destruction efficiency test shall be performed annually on the RTO. This condition is on Page 10 of 11. It is not clear if annual refers to the calendar year or fiscal year (October 1 - September 30). Clarify whether testing requirement is based on annual or fiscal year".*

Condition No. 7 has been modified to clarify the testing requirement as follows:

"A destruction efficiency test shall be performed ~~annually~~ on the RTO once every federal fiscal year."

10. *"Section III, Reporting and Recordkeeping Requirements, No. 13 Monthly Emissions Summary requires the specified records to be compiled no later than 5 days following each month. Because an automated system to measure flow rates is not employed at the facility, the process of compiling the raw data is complex and time consuming, Nailite requests that the facility be allowed 10 days to compile the records. Additionally, the previous permits have indicated 5 working days. Please clarify."*

The Department feels that the extension from five to ten days following each month for this reporting requirement is not an unreasonable request. Condition No. 13 has been modified to reflect this change.

CONCLUSION

The final action of the Department is to issue the permit with the changes noted above.

PERMITTEE

Nailite International, Inc.
1111 N.W. 165th Street
Miami, Florida 33169

Permit No.	0250407-008-AC
Project	Panel Spray Lines 1 and 2
SIC No.	3089
Expires:	July 31, 2005

Authorized Representative:

Mr. John Perry, Vice President of Operations

PROJECT AND LOCATION

The original construction permit authorized the applicant to construct a new plastics panel spray coating line (Line No. 2), and relocate the old spray line (Line No. 1) from its former location to be connected with the regenerative thermal oxidizer air pollution control system installed for the new line. This re-issuance of the final permit establishes collection and destruction efficiency values, and removes the operational deadline for panel spray line No. 1. This permit also modifies emission limitations for volatile organic compounds (VOCs), and modifies certain conditions in construction permits 0250407-005-AC, and 0250407-007-AC issued on December 31, 2002 and September 5, 2003 respectively.

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


STATEMENT OF BASIS

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

APPENDICES

The attached appendices are a part of this permit.

Appendix GC General Permit Conditions



Michael G. Cooke, Director
Division of Air Resource
Management

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION I. FACILITY INFORMATION

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

Nailite manufactures and coats plastic shingles molded from polypropylene pellets. The former Nailite facility, consisting of Line No. 1 (EU-001), was located at 1251 NW 165th Street in Miami, Dade County. The new plastic panel spray line, Line No. 2 (EU-002), is located at 1111 NW 165th Street, approximately 500 feet east of the former facility. Under the original construction permit, 0250407-002-AC (PSD-FL-289) issued on September 26, 2000, Line No. 1 was relocated to the new address for operation alongside the new Line No. 2.

Line No.1 consists of three paint spray booths and a gas fired oven. The new No. 2 Line consists of three spray booths and an electric curing oven. Air pollution controls consist of a state-of-the-art Regenerative Thermal Oxidizer (RTO) for controlling Volatile Organic Carbons/Hazardous Air Pollutant (VOC/HAP) emissions. There are also nine injection molding machines with associated lubricating oil tanks, and 2 storage silos equipped with vacuum pump/filter systems.

The original maximum production capacity of 300,000 gallons of paints and solvents per line per year shall remain unchanged. Any increase above 300,000 gallons per line per year will require a modification of this permit per Rule 62-4.080 and Chapters 62-210 and 62-212 of the Florida Administrative Code.

The facility consists of the following emissions units.

EU No.	EMISSIONS UNIT DESCRIPTION
001	Spray Line No. 1 consists of 3 spray booths, 2 touch-up booths, and a gas-fired curing oven
002	9 Injection Molding Machines/Oil Tanks ¹
003	2 Storage Silos equipped with vacuum pump/filter systems ²
004	Spray Line No. 2 consists of 3 spray booths, and an electric curing oven

¹ Emissions unit 002 is exempt from permitting (exempt emissions unit) pursuant to Rules 62-210.300(3)(a)30, F.A.C (Oil Tanks) and 62-210.300(3)(b)1.b, F.A.C. (Injection Molding Machines), provided that the colorant and polypropylene pellets do not contain VOCs or HAPs. The owner or operator should maintain records of Material Safety Data Sheets (MSDS) to verify that this emissions unit remains exempt. This emissions unit is subject to the facility-wide specific conditions of Section II of this permit. Estimated maximum potential VOC emissions from the injection molding machines are negligible.

² Emissions unit 003 is exempt from permitting (exempt emissions unit) pursuant to Rules 62-210.300(3)(b)1.b, F.A.C., provided that the point of emissions remains exclusively through the baghouse. This emissions unit is subject to the facility-wide specific conditions of section II of this permit. Estimated maximum potential VOC emissions from the injection molding machines are negligible.

REGULATORY CLASSIFICATION

This facility is a Major or Title V HAP source because emissions of at least one hazardous air pollutant exceeds 10 tons per year and emissions of total HAPs exceed 25 tons per year.

Because controlled emissions of VOCs will not exceed 250 tons per year (TPY) this facility is a synthetic minor facility with respect to the Department's Prevention of Significant Deterioration (PSD) rules. The facility is not within an industry included in the list of 28 Major Facility Categories per Table 62-212.400-1, F.A.C., therefore, the major source threshold of 250 TPY must be reached before PSD applies.

Emission unit 004 (spray line No. 2) is subject to a case-by-case Maximum Achievable Control Technology (MACT) Determination in accordance with Rule 62-204.800(10)(d)2, F.A.C. The Department's case-by-case MACT determination for line No. 2 was issued with the PSD permit on September 26, 2000 and was subject to setting final emission limits based on required testing.

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION I. FACILITY INFORMATION

On April 19, 2004, the EPA published the final MACT Subpart PPPP for the Surface Coating of Plastic Parts Industry. Existing affected sources must be in compliance with this final MACT rule no later than April 19, 2007. Because the units at this facility were constructed or began construction before December 4, 2002, this facility is considered an existing source and the facility (spray lines 1 and 2) has until April 19, 2007 to meet the more stringent Federal MACT standard.

REVIEWING AND PROCESS SCHEDULE

6-22-04	Date of Receipt of Application
11-01-04	Date Application Complete
2-11-05	Notice of Intent Published in Newspaper

RELEVANT DOCUMENTS

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

- Permit Application
- Previous Case-by-Case MACT September 26, 2000
- Department's verbal request for additional information August 2, 2004
- Applicant's additional information November 1, 2004
- Department's Technical Evaluation and Preliminary Determination January 24, 2005
- Department's Notice of Intent to Issue January 28, 2005

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION II. FACILITY WIDE SPECIFIC CONDITIONS

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

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Air Division of the Dade County Department of Environmental Resources Management (DERM), Suite 900, 33 Southwest Second Avenue, Miami, Florida 33130-1540 (phone number: 305/372-6925). All applications for permits to construct or modify an emission unit subject to Prevention of Significant Deterioration or Nonattainment (NA) Review requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
2. General Conditions: The owner and operator are subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on May 30, 2005. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210 and 62-212.400(2)(g), F.A.C.]
7. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit must be obtained prior to the beginning of construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
8. Title V Operation Permit Required: This permit authorizes construction and/or installation of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for and receive a Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's appropriate District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION II. FACILITY WIDE SPECIFIC CONDITIONS

EMISSIONS LIMITING STANDARDS

9. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]
10. Unconfined Emissions of Particulate Matter: [Rules 62-296.320(4)(c) and 62-212.400, F.A.C.]
- (a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
- (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
- (c) Reasonable precautions include the following:
- Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - Confining abrasive blasting where possible.
 - Enclosure or covering of conveyor systems.
- (d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.
11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]
- (a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. (Not federally enforceable)
- [Note: An objectionable odor is defined in Rule 62-210.200(203), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.]

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION II. FACILITY WIDE SPECIFIC CONDITIONS

OPERATIONAL REQUIREMENTS

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

[Note: A quarterly written report is hereby requested by the Department for every quarter that the facility is in operation. If no malfunctions occurred during a quarter, a written report stating that no malfunctions occurred shall be submitted. Reports shall be submitted within 30 days following the calendar quarter.]

13. Circumvention: No person shall circumvent any air pollution control device or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]
14. Excess Emissions: For purposes of this permit, all limits established pursuant to the State Implementation Plan, including those limits established as BACT, include emissions during periods of startup and shutdown, and are not subject to the provisions of Rule 62-210.700(1), F.A.C. This provision cannot be used to vary any NESHAP requirements from any subpart of 40 CFR 63 [Rule 62-210.700(5), F.A.C.]

Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown or malfunction shall be prohibited pursuant to Rule 62-210.700(4), F.A.C. [Rules 62-4.070(3) and 62-210.700(5), F.A.C.]

For purposes of this permit, all emissions limits include emissions during periods of startup, shutdown, and malfunction and are not subject to the provisions of Rule 62-210.700(1), F.A.C. Excess emissions resulting from malfunction of any emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION II. FACILITY WIDE SPECIFIC CONDITIONS

16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
18. Test Procedures shall meet all applicable requirements of Rule 62-297.310(4), F.A.C. [Rule 62-297.310(4), F.A.C.]
19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]
 - a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]
21. Test Notification: The permittee shall notify the appropriate Department District Office and the appropriate local program at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]
22. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION II. FACILITY WIDE SPECIFIC CONDITIONS

REPORTING AND RECORD KEEPING REQUIREMENTS

23. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]
24. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]
25. Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the appropriate Department District Office and the appropriate local program within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the NESHAP requirements, excess emissions shall also be reported in accordance with 40 CFR 63, Subpart A. [Rule 62-4.130, F.A.C.]
26. Excess Emissions Report - Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the appropriate Department District Office and the appropriate local program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rule 62-210.700(6), F.A.C.]
27. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for an Air Pollutant Emitting Facility shall be completed each year using DEP Form 62-210.900(5) and shall be submitted to the appropriate department District Office and the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

The following specific conditions apply to the following emissions units:

EU No.	EMISSIONS UNIT DESCRIPTION
001	Coating Line No. 1 consists of 3 spray booths, 2 touch-up booths, and a gas-fired curing oven
004	Coating Line No. 2 consists of 3 spray booths, and an electric curing oven

EMISSIONS LIMITING AND PERFORMANCE STANDARDS

1. Hours of Operation: This permit supersedes the applicable conditions of the existing air operation permit for the facility. Hours of operation are not restricted because capacity is restricted by other enforceable limits. Emissions Units 001, 002, 003, and 004 may each operate for up to 8,760 hours/year. The facility is required to keep daily records of the operating hours. [Rules 62-210.200, F.A.C., Definitions -- Potential to Emit (PTE) and 62-213.440(1)(b)1.b., F.A.C.]
2. Process Rate Limitation: The maximum amount of coating applied shall not exceed 300,000 gallons per line during any consecutive 12 month period. Emission Unit 001 and Emission Unit 004 shall only operate while appropriately connected to the RTO so that emissions are effectively controlled. [Rules 62-4.070(3), 62-212.400(2)(g), 62-204.800(10)(d)2., and 62-210.200 (PTE), F.A.C., and MACT]
3. Control System Performance: The average combustion temperature within the thermal incinerator, for any 3-hour rolling average when the emissions unit is in operation, shall not fall below 1500 degrees F and shall be maintained by using supplementary natural gas. Operation below the specified minimum temperature resulting from malfunction of the RTO or supplementary gas system shall be permitted providing: (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two 3-hr averages in any 24 hour period unless specifically authorized by the Department for longer duration [Rule 62-4.070(3)]
4. Unit 001 and Unit 004 Enclosures:
 - a) The direction of air flow through all natural draft openings shall be into the enclosure.
 - b) All access doors and windows that were closed during performance testing including capture and destruction efficiency testing shall remain closed during routine operation.
[Rule 62-4.070(3)]
5. Control Technology Requirements: The owner or operator shall install and operate a regenerative thermal oxidizer for the control of VOC/HAPS as specified in the application and subsequent documents submitted in support thereof. [Rule 62-4.070(3) and 62-212.400(2)(g), F.A.C.; case-by-case MACT for line 2.]
 - a) The RTO shall operate with at least 97 percent destruction efficiency. [MACT for Line 2]
 - b) Capture efficiency of Unit 001 shall be no less than 70 percent.
 - c) Capture efficiency of Unit 004 (line 2) shall be no less than 90 percent. [MACT for Line 2]
6. Emission Limits for VOC:
 - a) For the facility, the maximum amount of VOC contained in all coatings, thinners and/or other additives, and cleaning materials used in the coating operation shall not exceed 1,000 tons per consecutive 12-month period.

[Note: The facility may apply for a permit modification to adjust the annual VOC usage limit by demonstrating better capture efficiencies based on test results using EPA Methods 204, and 204 A through 204D as described in 40 CFR 51 Appendix M.]

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

b) For the facility, emissions of VOC after control from all materials including coating, thinners and/or other additives, and cleaning materials shall not exceed 249 tons during any consecutive 12 months and shall not exceed 30 tons during any single month.

c) For purposes of this permit, all emissions limits include emissions during periods of startup, shutdown, and malfunction and are not subject to the provisions of Rule 62-210.700(1), F.A.C.

[Rules 62-4.070(3), 62-212.400(2)(g), 62-210.700(1) and (6), F.A.C., and MACT]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

7. Destruction Efficiency of RTO: The permittee shall demonstrate compliance with the minimum RTO destruction efficiency specified in Condition 5 of this section. The demonstration shall be made by comparing the total gaseous organic emissions mass flow rates at the inlet and the outlet to the RTO during three separate one-hour test runs as determined by EPA Method 25A. Appropriate EPA methods for determining gas volumetric flow rate, dry molecular weight, and stack gas moisture must be performed during each test run as described in Appendix A as well. A destruction efficiency test shall be performed on the RTO once every federal fiscal year. [Rule 62-4.070(3)]
8. Capture Efficiencies of Line Enclosures: The permittee shall demonstrate compliance with the minimum VOC/HAP capture efficiencies of EU-001 and EU-004 by comparing raw VOC/HAP emissions to the captured emissions generated during each of three separate one-hour test periods. Raw emissions shall be based on material usage rates, and material content information from Material Safety Data Sheets supplied by the manufacturer. Captured emissions shall be based on measured flow rates and VOC/HAP concentrations in the RTO inlet duct as determined by EPA Methods specified in the destruction efficiency tests described above. A capture efficiency test shall be performed once every five years. For reference, these tests were conducted in 2004 and should be conducted again in 2009. Results from the capture efficiency test required by 40 CFR 63, Subpart PPPP may be used to demonstrate compliance with this condition. [Rule 62-4.070(3)]

REPORTING AND RECORD KEEPING REQUIREMENTS

9. Test Reports: Within 45 days following completion of performance testing, results of the tests shall be submitted along with a complete test report to the Department's Southeast District and the Miami-Dade County Environmental Resources Management Department (DERM). [Rule 62-4.070(3) F.A.C.]
10. Malfunction Notifications: Within one working day, the permittee shall notify the Department's District Office and DERM of any 3-hour period that an emissions unit is in operation in which the average combustion temperature within the thermal incinerator falls below the average temperature during the most recent destruction efficiency test that demonstrated the emissions unit was in compliance. [Rules 62-4.070(3) and 62-4.130, F.A.C.]
11. VOC/HAP Content Records: The permittee shall maintain records of the VOC/HAP content of each coating, thinner, cleaning agent, and other materials containing VOC/HAP used at the facility. Records shall consist of Manufacturer's Safety Data Sheets (MSDS) or EPA Method 24 results. If a material record shows a range for the VOC/HAP content, then the highest value shall be used to determine usage and emissions. [Rule 62-4.070(3), F.A.C.]
12. Material Usage Records: The permittee shall record the amounts (gallons) of each VOC/HAP containing material used, based on monthly inventory. [Rule 62-4.070(3), F.A.C.]
13. Monthly Emissions Summary: No later than 10 days following each month, the permittee shall record the following information in a written log to demonstrate compliance with the emissions limits specified in this permit.
 - a) Gallons and pounds of each VOC/HAP containing material used during the month.

AIR CONSTRUCTION PERMIT 0250407-008-AC
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

- b) Weight percentage of VOC/HAP in each material used based on material records.
- c) Pounds of each VOC/HAP used during the month and tons during the last consecutive 12 months.
- d) The minimum required 3-hour average RTO combustion temperature as established by the most recent compliance test for destruction efficiency.
- e) Pounds of VOC/HAP emissions destroyed by the RTO during the month and tons during the last consecutive 12 months. Emissions destroyed by the RTO shall be calculated by multiplying the total VOC/HAP used by the permitted capture efficiency for the coating line and permitted minimum destruction efficiency. For each 3-hour period of operation below the minimum RTO combustion temperature, the RTO destruction efficiency shall be assumed to be 0%. *Example:* Assume the following: Coating Line No. 1 operated for 360 hours/month, used 30 tons of VOC/month, and had two 3-hour periods when the RTO combustion temperature fell below the minimum requirement. Emissions destroyed by the RTO would be calculated as:

$$\text{VOC}_{\text{destroyed}} = \frac{(60,000 \text{ lb VOC/month}) (0.70) (0.97) (360 - 6 \text{ hr/month})}{(360 \text{ hours/month})} = 40061 \text{ lb VOC/month}$$

- f) Pounds of VOC/HAP emissions after control during the last month and tons during the last consecutive 12 months. VOC/HAP emissions after control shall be calculated by subtracting the amount of emissions destroyed by the RTO from the total VOC/HAP used as described above.

[Rules 62-4.070(3) and 62-212.400(2)(g), F.A.C.]

- 14. Records Duration: The permittee shall maintain all records, reports, and notifications for at least five years from the date of recording. [Rule 62-213.440(1)(b)2.b., F.A.C.]

ADDITIONAL REQUIREMENTS

- 15. NESHAP Applicability: On April 19, 2004, the EPA published the final MACT Subpart P for the Surface Coating of Plastic Parts Industry. Existing affected sources must be in compliance with this final MACT rule no later than April 19, 2007. Because the units at this facility were constructed or began construction before December 4, 2002, this facility is considered an existing source and has until April 19, 2007 to comply with the Federal MACT standard. Nailite shall request and obtain a construction permit prior to implementing any changes pursuant to the MACT that affect the conditions of this permit.

[Rules 62-4.070(3), F.A.C.; 40 CFR 63, Subpart P]

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

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

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

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

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ();
 - (b) Determination of Case-by-Case Maximum Achievable Control Technology (X)
 - (c) Determination of Prevention of Significant Deterioration (X); and
 - (d) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.