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MIAMI-DADE COUNTY, FLORIDA

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BUREAU OF AIR REGULATION



ENVIRONMENTAL RESOURCES MANAGEMENT
AIR QUALITY MANAGEMENT DIVISION
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SUITE 900
MIAMI, FLORIDA 33130-1540
TELEPHONE: (305) 372-6925
FAX: (305) 372-6954

August 28, 2000

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

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

Dear Mr. Reynolds:

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

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

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

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

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

The Miami-Dade County DERM believes that both the existing and the new operations should be considered comprehensively in reviewing the construction application, and arriving at a BACT/MACT determination. The correct approach would be to perform a case-by-case MACT determination for the entire facility.

Nailite must commit to consolidate and connect the existing operation (AV 0250407) to the Thermal Oxidizer by a specific date acceptable to the regulatory agency. The consolidated operation must meet the required minimum capture efficiency of 95%.

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

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

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

Sincerely,

Mallika Muthiah

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

Enc. Inspection report

cc: *G. Reynolds*
D. Buff, Saldor
D. Stidmore, Nailite
SED
NPS
EPA

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

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

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

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

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 St. Magnolia Drive Tallahassee, FL 32301 Telephone: (850) 488-0114 Fax: (850) 922-6979	Miami-Dade County Dept. of Environmental Mgmt. 33 S.W. 2 nd Avenue, Suite 900 Miami, FL 33130-1540 Telephone: (305) 372-6925 Fax: (305) 372-6954	Dept. of Environmental Protection Southeast District 400 North Congress Avenue West Palm Beach, FL 33416-5425 Telephone: (561) 681-6600 Fax: (561) 681-6755.
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The complete project file includes the application, technical evaluations, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Documents related to the Department's proposed action are available at www.dep.state.fl.us/air by clicking on "permitting" and then on "construction permits." Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call (850) 488-0114 for additional information.

Golder Associates Inc.

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



August 17, 2000

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

Attention: Office of General Council

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

Dear : Ms. Teri Donaldson

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

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

Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

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

Benny Susi, P.E.
Assoicate

BS/jkw

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

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