



March 1, 1995

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FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
WEST PALM BEACH

Ms. Stephanie Brooks  
Florida Department of Environmental Protection  
Southeast District Office  
1900 South Congress Avenue  
West Palm Beach, FL 33416

Re: Dade County  
AP - Nailite International  
AO13-221985

Dear Ms. Brooks:

This correspondence references our telephone conversation on Tuesday, February 21, concerning the revised air operating permit issued by your office to Nailite International. This revised permit was issued pursuant to Rule 62-296.570 to establish reasonably available control technology (RACT) limits for major sources of volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) in Dade, Broward, and Palm Beach counties.

The revised operating permit included a VOC emission limit of 6.0 pounds of VOC per gallon of coating applied. This limit was based on a limit proposed by Nailite and submitted to the Department in December 1994. The proposed VOC emission limit was based on Nailite's proposal to implement the use of higher solids coatings for their paint booth operation. However, Nailite has not yet incorporated the use of these coatings at the facility. These coatings will be implemented as expeditiously as possible and no later than the RACT compliance date of May 31, 1995 [Rule 62-296.570(4)(a)1]. The revised operating permit does not reference the RACT compliance date; therefore, the permit requires that Nailite meet the lower emission limit at the time the revised permit was issued (i.e., February 9, 1995). Because Nailite has not yet implemented the higher solids coatings, Nailite is not able at this time to comply with the emission limit stated in the revised operating permit.

KBN Engineering and Applied Sciences, Inc. (KBN), on behalf of Nailite, would like to request that the Department amend the revised operating permit to establish an effective date of May 31, 1995, for the VOC emission limit of 6.0 lb VOC/gallon. Suggested wording for Specific Condition 1(c) of the permit would be:

Beginning May 31, 1995 and thereafter, VOC emissions from the facility shall not exceed 6.0 lb VOC/gallon of coating.

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KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 23rd Street, Suite 500 Gainesville, Florida 32653-1500 904-336-5600 FAX 904-336-6603	5405 West Cypress Street, Suite 215 Tampa, Florida 33607 813-287-1717 FAX 813-287-1716	1801 Clint Moore Road, Suite 105 Boca Raton, Florida 33487 407-994-9910 FAX 407-994-9393	7785 Baymeadows Way, Suite 105 Jacksonville, Florida 32256 904-739-5600 FAX 904-739-7777	1616 "P" Street N.W., Suite 450 Washington, D.C. 20036 202-462-1100 FAX 202-462-2270
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Ms. Stephanie Brooks  
March 1, 1995  
Page 2



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Please contact me if you have any questions.

Sincerely,

Gail C. Rampersaud  
Associate Engineer

GCR/vjp

cc: William Eagle, Nailite  
David Buff, KBN  
File (2)