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BUREAU OF AIR REGULATION

**TITLE V AIR OPERATING PERMIT APPLICATION  
FOR  
NEW PANEL FINISHING SPRAY LINE  
NAILITE INTERNATIONAL, INC.**

**Prepared For:  
Nailite International, Inc.  
1111 NW 165th Street  
Miami, Florida 33169**

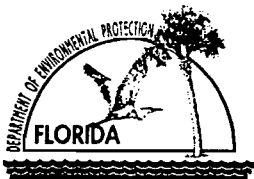
**Prepared By:  
Golder Associates Inc.  
6241 NW 23rd Street, Suite 500  
Gainesville, Florida, 32653-1500**

**February 2002  
0037523**

*This issued  
by miami District*

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**3 Copies – Dade County Environmental Resource Management  
1 Copy - Florida Department of Environmental Protection  
1 Copy – Nailite International, Inc.  
1 Copy – Golder Associates Inc.**



# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

##### Identification of Facility

1. Facility Owner/Company Name: <b>Nailite International, Inc.</b>	
2. Site Name: <b>Nailite International, Inc.</b>	
3. Facility Identification Number: <b>025047</b> [ ] Unknown	
4. Facility Location: Street Address or Other Locator: <b>1111 NW 165th Street</b> City: <b>Miami</b> County: <b>Dade</b> Zip Code: <b>33169</b>	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

##### Application Contact

1. Name and Title of Application Contact: <b>Howard F. Wasserman, President and CEO</b>	
2. Application Contact Mailing Address: Organization/Firm: <b>Nailite International, Inc.</b> Street Address: <b>1111 NW 165th Street</b> City: <b>Miami</b> State: <b>FL</b> Zip Code: <b>33169</b>	
3. Application Contact Telephone Numbers: Telephone: <b>(305) 620-6200</b> Fax: <b>(305) 623-8227</b>	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<b>2/21/02</b>
2. Permit Number:	<b>0250407-004-AV</b>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

## **Purpose of Application**

### **Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

- ☒ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: 0250407-003-AC (PSD-FL-289)

Operation permit number to be revised: 0250407-001-AV

- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: \_\_\_\_\_

- ☐ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: \_\_\_\_\_

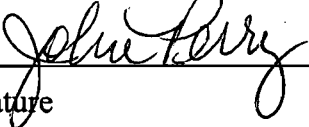
Reason for revision: \_\_\_\_\_

### **Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>John Perry, Vice President of Operations</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: <b>Nailite International, Inc.</b> Street Address: <b>1111 NW 165th Street</b> City: <b>Miami</b> State: <b>FL</b> Zip Code: <b>33169</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>( 305 ) 620 - 6200</b> Fax: <b>( 305 ) 623 - 8227</b>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ X ], if so) of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.</i>  <div style="display: flex; justify-content: space-between;"><div style="text-align: center;"> _____ Signature</div><div style="text-align: center;"><u>2/18/02</u> _____ Date</div></div>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Benny Susi</b> Registration Number: <b>35042</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Golder Associates Inc.</b> Street Address: <b>6241 NW 23<sup>rd</sup> Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>( 352 ) 336 - 5600</b> Fax: <b>( 352 ) 336 - 6603</b>

4. 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.*

*If the purpose of this application is to obtain a Title V source 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 schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit 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.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ X ], 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: 2/15/02

\*Attach any exception to certification statement.

**Scope of Application**

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
--	No. 2 Panel Finishing Spray Line		0

**Application Processing Fee**

Check one: ☐ Attached - Amount: \$: 0 ☒ Not Applicable

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

Title V application to incorporate the provisions of Permit No. 0250407-003-AC/PSD-FL-289 for the addition of a new panel finishing spray line consisting of 3 spray coating booths, an electric oven, and a thermal oxidizer.

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

**Application Comment**

### A. GENERAL FACILITY INFORMATION

1. Facility UTM Coordinates: Zone: <b>17</b>				East (km): <b>578.4</b>	North (km): <b>2867.2</b>
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): <b>25 / 55 / 25</b>					
Longitude (DD/MM/SS): <b>80 / 13 / 9</b>					
3. Governmental Facility Code:	4. Facility Status Code:	5. Facility Major Group SIC Code:	6. Facility SIC(s):		
<b>0</b>	<b>A</b>	<b>30</b>	<b>3089</b>		
7. Facility Comment (limit to 500 characters):          					

1. Name and Title of Facility Contact: <b>John Perry, Vice President of Operations</b>
2. Facility Contact Mailing Address: Organization/Firm: <b>Nailite International, Inc.</b> Street Address: <b>1111 NW 165th Street</b> City: <b>Miami</b> State: <b>FL</b> Zip Code: <b>33169</b>
3. Facility Contact Telephone Numbers: Telephone: ( <b>305</b> ) <b>620 – 6200</b> Fax: ( <b>305</b> ) <b>620 - 8227</b>



**Facility Regulatory Classifications**

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input checked="" type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):  <b>The case-by-case MACT requirements under NESHAP applies to the No. 2 Panel Finishing Spray Line.</b>	

**List of Applicable Regulations**

<b>Not Applicable</b>	

## B. FACILITY POLLUTANTS

### List of Pollutants Emitted

[illegible]

## C. FACILITY SUPPLEMENTAL INFORMATION

### Supplemental Requirements

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>NI-FI-E1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>NI-FI-E2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID: <u>NI-FI-E3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment:  <b>Compliance testing previously provided to DEP and DERM in a letter dated April 10, 2001.</b>

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: <b><u>Attachment A</u></b> <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**ATTACHMENT NI-FI-E1**

**AREA MAP**

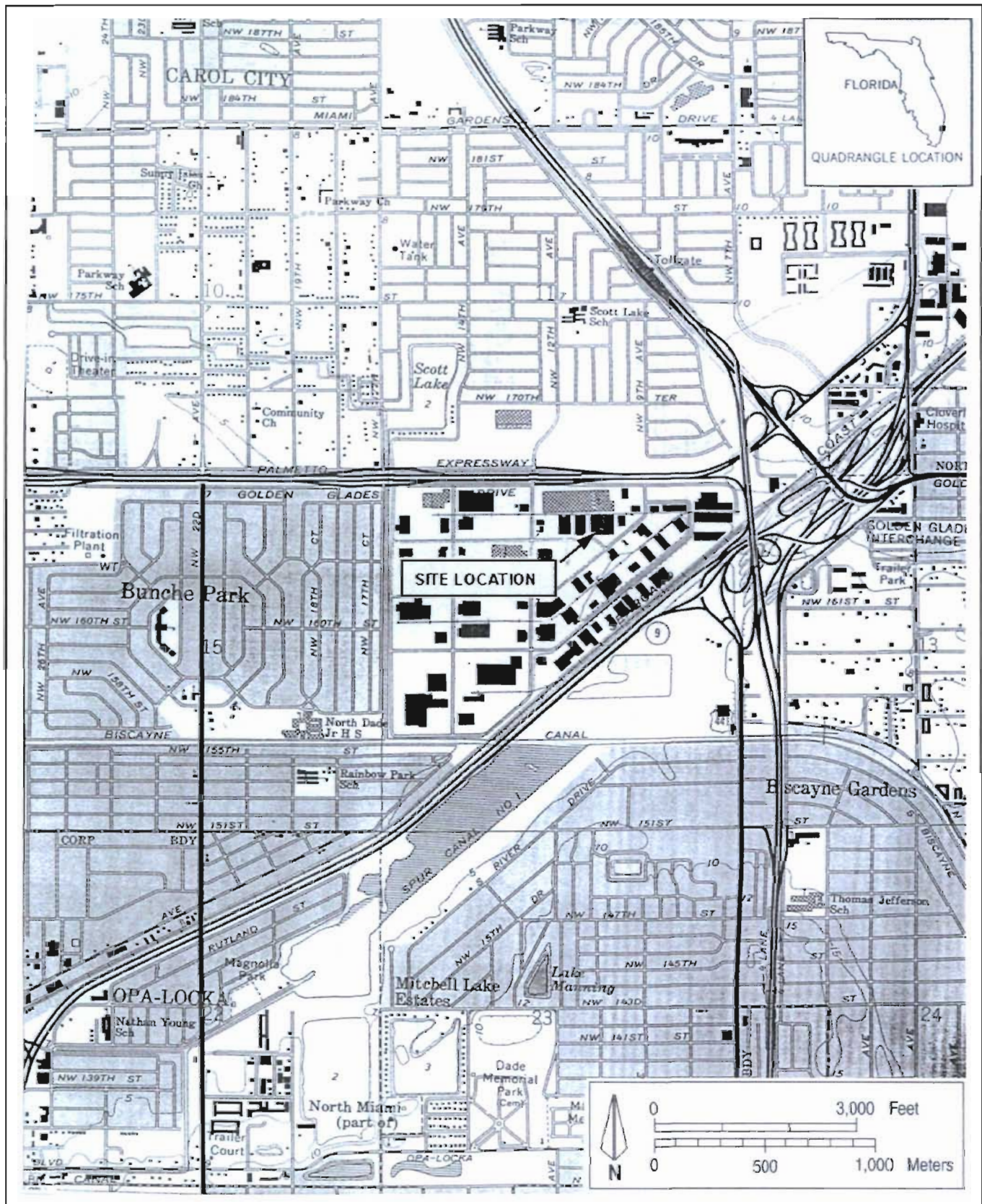


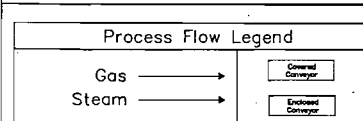
Figure NI-Fi-E1  
Location of Nailite International

Sources: USGS, 1972; Golder, 2000.



**ATTACHMENT NI-FI-E2**

**FACILITY PLOT PLAN**

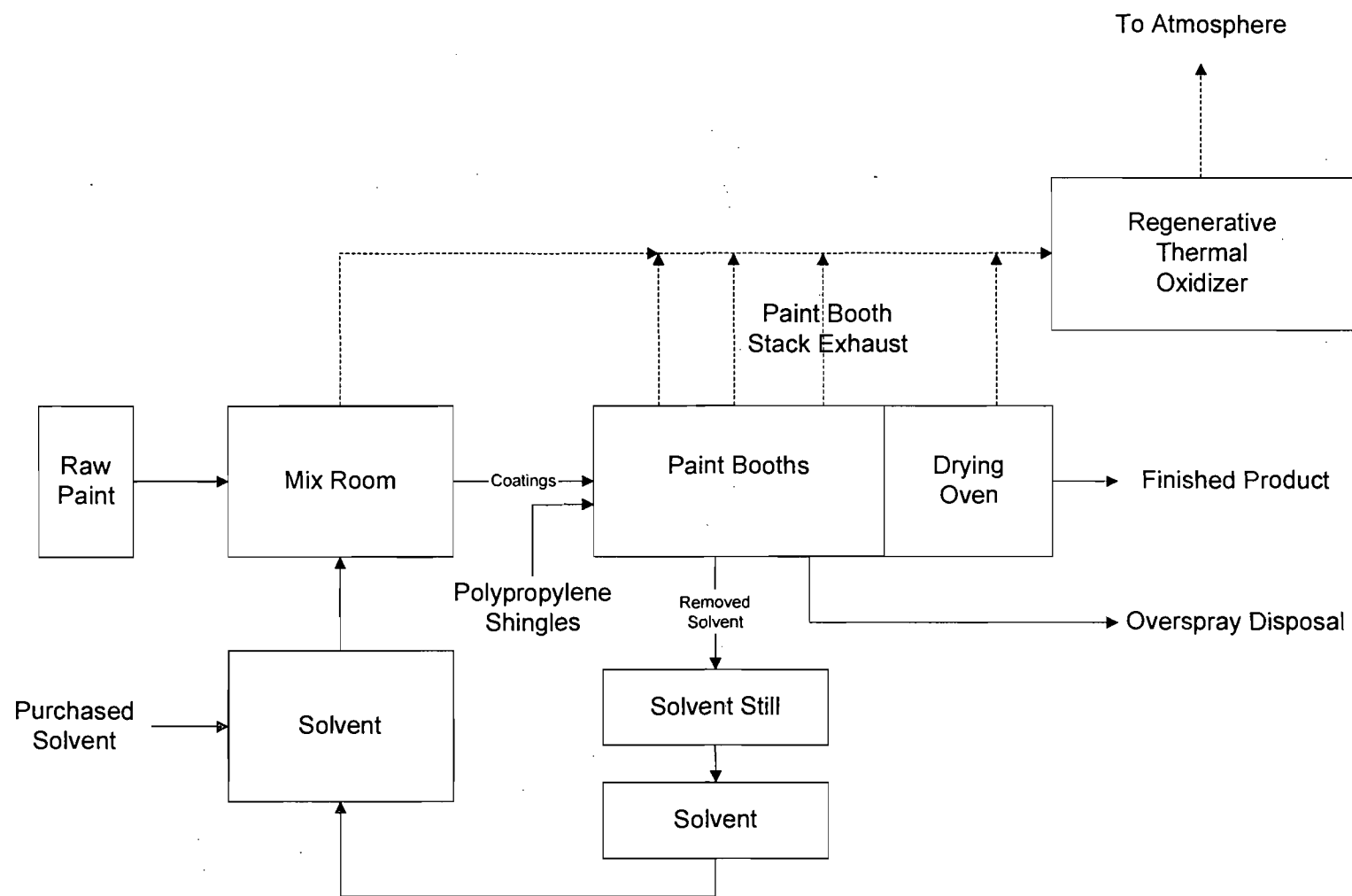


00375337/P2/W/1998 2-1-99 02/1/02 4





**ATTACHMENT NI-FI-E3**  
**PROCESS FLOW DIAGRAM**



Attachment NI-FI-E3  
Process Flow Diagram of the New  
Panel Finishing Spray Line

**Process Flow Legend**  
Solid/Liquid —————>  
Gas - - - - ->

Filename: 0037523Y/F2/WP/FLOW.VSD (NI-FI-E3)

Date: 02/13/02



**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION**  
**(All Emissions Units)****Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> 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).			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
<b>New Spray Booths, Oven and Thermal Oxidizer</b>			
4. Emissions Unit Identification Number:		[ ] No ID	
ID: <b>004</b>		[ ] ID Unknown	
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
<b>A</b>		<b>30</b>	[ ]
9. Emissions Unit Comment: (Limit to 500 Characters)			
<b>The emission unit consists of three spray paint booths exhausting through a thermal oxidizer. Other sources which are considered part of this process and which the emissions are accounted for in this emission unit are fugitive emissions from the product conveyers and an electric curing oven to dry the shingles after the painting process.</b>			

**Emissions Unit Control Equipment**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Panel Filter

Thermal Oxidizer

Low Solvent Coating

2. Control Device or Method Code(s): **58, 21, 102****Emissions Unit Details**

1. Package Unit:	
Manufacturer:	Model Number:
2. Generator Nameplate Rating: MW	
3. Incinerator Information:	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	<b>1,600</b> °F

**B. EMISSIONS UNIT CAPACITY INFORMATION**  
(Regulated Emissions Units Only)**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	7.15	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:	300,000	gal/yr
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	24	hours/day
	7	days/week
	52	weeks/year
	8,760	hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
Supplemental propane usage during startup or high fire conditions only. Throughout rate relates to gallons of coating per year used on the spray line.		

**C. EMISSIONS UNIT REGULATIONS**  
(Regulated Emissions Units Only)**List of Applicable Regulations**

62-210.300 (1) – Air Construction Permits
62-296.320 (1)(a) – Volatile organic compounds emissions
62-296.500 (1) – Applicability – RACT
62-296.500 (2)(a) 1 and 2 – Permits – special consideration
62-296.500 (2)(b) – Recordkeeping
62-296.500 (4) – Consideration of exempt solvents
62-296.500 (6) – Specific Emission Limitations
62-296.570 (1) – Applicability
62-296.570 (2) – Compliance
62-296.570 (3) – Operation Permit Requirements
62-296.570 (4) – RACT emissions limiting standards
62-296.570 – RACT Requirements for major VOC and NO <sub>x</sub> -emitting facilities

**D. EMISSION POINT (STACK/VENT) INFORMATION**  
(Regulated Emissions Units Only)**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? <b>EU1</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>30</b> feet	7. Exit Diameter: <b>3.67</b> feet	
8. Exit Temperature: <b>609</b> °F	9. Actual Volumetric Flow Rate: <b>22,015</b> acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>Emissions associated with the three spray booths are individually vented through a single thermal oxidizer. Stack parameters are for the thermal oxidizer.</b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
**(All Emissions Units)****Segment Description and Rate:** Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  Surface coating application general – solvent base paint		
2. Source Classification Code (SCC): <b>4-02-001-10</b>		3. SCC Units: <b>gallons of coating</b>
4. Maximum Hourly Rate: <b>61</b>	5. Maximum Annual Rate: <b>300,000</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):  Maximum hourly rate is based on all three paint booths operating at a maximum throughput.		

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

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  Miscellaneous Manufacturing Industries-In Process Fuel Use – Liquefied Petroleum Gas		
2. Source Classification Code (SCC): <b>3-90-010-99</b>		3. SCC Units: <b>Million Cubic Feet Burned</b>
4. Maximum Hourly Rate: <b>0.00715</b>	5. Maximum Annual Rate: <b>2.86</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>1,000</b>
10. Segment Comment (limit to 200 characters):  Liquefied petroleum gas (propane) is used as a supplemental fuel, based on 400 hr/yr for start-up and 7.15 MMBtu/hr.		



**F. EMISSIONS UNIT POLLUTANTS**  
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC			EL
PM			NS
PM10			NS
H169			NS
H186			NS
SO2			NS
CO			NS
SO2			NS
NOX			NS
HAPS			EL

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>VOC</b>		2. Total Percent Efficiency of Control: <b>95 %</b>	
3. Potential Emissions: <b>53.1 lb/hour      130.5 tons/year</b>		4. Synthetically Limited? <b>[ X ]</b>	
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: <b>See Attachment NI-EU1-H8</b> Reference: <b>Proposed MACT</b>		7. Emissions Method Code: <b>2</b>	
8. Calculation of Emissions (limit to 600 characters):  <b>See Attachment NI-EU1-H8. Includes fugitive emissions from coating line plus thermal oxidizer emissions.</b>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <b>Potential emissions based on a throughput of 300,000 gal/yr of paints and solvents.</b>			

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>OTHER</b>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: <b>6 lb VOC/gal coat/ 95% destroyed</b>		4. Equivalent Allowable Emissions: <b>53.1 lb/hour      130.5 tons/year</b>	
5. Method of Compliance (limit to 60 characters):  <b>Monthly Record-keeping</b>			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>Permit No. 0250407-003-AC/PSD-FL-289</b>			

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions**

1. Pollutant Emitted: <b>HAPS</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>38.2 lb/hour      93.96 tons/year</b>		4. Synthetically Limited? <b>[ X ]</b>	
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: <b>2 % of VOC emissions</b> Reference: <b>MSDS (See Comment)</b>		7. Emissions Method Code: <b>3</b>	
8. Calculation of Emissions (limit to 600 characters):  <b>53.1 lb VOC/hr x 72% = 38.2 lb/hr</b> <b>130.5 tons VOC/yr x 72% = 93.96 TPY</b>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):  <b>Based on toluene plus xylene content of paints.</b>			

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:		4. Equivalent Allowable Emissions:  lb/hour      tons/year	
5. Method of Compliance (limit to 60 characters):			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

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

1. Visible Emissions Subtype: <b>VE5</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>5</b> %      Exceptional Conditions: <b>20</b> % Maximum Period of Excess Opacity Allowed: <b>3</b> min/hour	
4. Method of Compliance:  <b>EPA Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>62-296.401(1)(a).</b>	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor of

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number: <div>Serial Number:</div>	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION**  
(Regulated Emissions Units Only)**Supplemental Requirements**

1. Process Flow Diagram [ X ] Attached, Document ID: <u>NI-FI-E3</u> [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ X ] Attached, Document ID: <u>NI-EU1-J3</u> [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID: _____ [ X ] Previously submitted, Date: <u>April 10, 2001</u> [ ] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID: _____ [ X ] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID: _____ [ X ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID: _____ [ X ] Not Applicable
10. Supplemental Requirements Comment:          

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation [ ] Attached, Document ID: _____ [ X ] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [ ] Attached, Document ID: _____ [ X ] Not Applicable
13. Identification of Additional Applicable Requirements [ X ] Attached, Document ID: <b>Attachment A</b> [ ] Not Applicable
14. Compliance Assurance Monitoring Plan [ ] Attached, Document ID: _____ [ X ] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [ X ] Not Applicable

**ATTACHMENT NI-EU1-H8**  
**CALCULATIONS OF EMISSIONS**

## Attachment NI-EU1-H8a. Maximum Potential Volatile Organic Compounds (VOC) Emissions, Nailite

Attachment #1: EOP Reg. Maximum Potential Volatile Organic Compounds (VOC) Emissions, Name													
Product	Maximum Paint Usage		Maximum VOC Content (lb/gal)	Potential Uncontrolled VOC		Fugitive Emissions		VOC to Thermal Oxidizer		VOC from Thermal Oxidizer		Total VOC Emission	
	(gal/hr)	(gal/yr)		(lb/hr)	(TPY)	(lb/hr)	(TPY)	(lb/hr)	(TPY)	Maximum Hourly Emissions (lb/hr) (a)	Maximum Annual Emissions (TPY) (b)	(lb/hr)	(TPY)
<u>Coatings</u>													
Maximum Hourly	34.25	—	6.0	205.5	—	20.5	—	184.9	—	9.25	—	29.8	—
Annual	—	300,000	6.0	—	900.0	—	90.0	—	810.0	—	40.5	—	130.5

## notes:

(a) Based on 90% capture efficiency (10% fugitive emissions), 6 lb VOC/gal, and 95% thermal oxidizer control efficiency.

(b) Based on 8,760 hr/yr.



**ATTACHMENT NI-EU1-J3**

**DETAILED DESCRIPTION OF CONTROL EQUIPMENT**

**SYSTEM ENERGY CALCULATION:**

These calculations are based on design process flow and solvent composition rates as provided by Nailite International.

	<u>RETOX® 27.0 RTO95</u>
1. Process Flow Rate, Scfm	27,000
2. Oxidizer Inlet Temp, °F	80
3. Oxidizer Outlet Temp., °F	229
4. Oxidation Temperature, °F	1,600
5. Solvent Composition Rate, #/Hr.	367.5
6. Heating Value of Solvent, Btu/#	12,000
7. Net Energy from Solvent, BTU/Hr	4,410,000
8. Energy Required, MMBTU/Hr	Zero
9. Energy Cost/Hr. @ \$5.00/MMBTU	Zero
10. Fan Horsepower	75
11. Fan Energy Usage, KW	56
12. Fan Energy Cost/Hr @ \$.06/KWH	\$3.36

**NOTE:**     *The above tabulation is for comparison purposes only and does not include casing heat losses.*

[ Energy requirements for the oxidizer is based on propane gas operation (7,150 CFH required at 5 Psig for one hour cold start-up/high fire condition). ]

**ATTACHMENT A**

**AIR CONSTRUCTION PERMIT**



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

October 22, 2001

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David G. Steedman  
Vice President of Operations  
Nailite International, Inc.  
1111 NW 165<sup>th</sup> Street  
Miami, Florida 33169

Re: Request for Extension of Expiration Date  
DEP File No. 0250407-003-AC (PSD-FL-289)

Dear Mr. Steedman:

The Department received your request on October 8 for a three-month extension of the expiration date of the referenced air construction permit to install a new panel finishing line at Nailite's facility in Dade County. Reasons stated for the extension are completion of all construction related activities and preparation of the Title V permit.

According to the Department's rules, an extension shall be granted if the applicant demonstrates reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by the applicable regulations [Rule 62-4.080(3), F.A.C.]. Since construction is essentially done and compliance testing has been successfully completed, the Department has reasonable assurance that the unit can demonstrate future compliance with the standards and conditions required by the permit and applicable regulations. Therefore, the permit expiration date is hereby extended from December 31, 2001 to March 31, 2002.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

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

*"More Protection, Less Process"*

*Printed on recycled paper.*

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 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. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

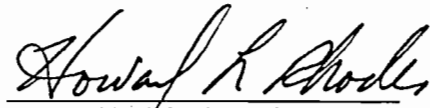
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

#### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 10/26/01 to the person(s) listed:

David G. Steedman, NII\*  
Benny Susi, P.E., Golder Associates, Inc.\*  
Gregg Worley, EPA  
John Bunyak, NPS  
Isador Goldman, SED  
Mallika Muthiah, Miami-Dade DERM

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)

10/26/01  
(Date)

Golder Associates Inc.

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

RECEIVED

OCT 08 2001



BUREAU OF AIR REGULATION

October 3, 2001

0037523

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

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

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

Dear Mr. Linero:

Golder Associates Inc. (Golder), on behalf of Nailite International is hereby requesting an extension of the above-referenced construction permit to provide the facility additional time to prepare the Title V operating permit and to ensure that the facility has completed all construction-related activities. An extension of 3 months would be considered appropriate.

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.  
Associate

BS/jkw

cc: John Perry, Nailite International, Inc.  
J. Reynolds, FDEP  
Mallika Muthiah, Chief, Environmental Resources Management

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Golder Associates Inc.

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



March 8, 2001

0037523

Mr. Francis Morlu  
South Florida Environmental Services  
6821 Vista Parkway North  
West Plam Beach, FL 33411

RE: REQUESTS FOR BID  
COMPLIANCE TESTING  
NAILITE INTERNATIONAL, INC.  
MIAMI, FLORIDA

Gentlemen:

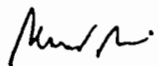
Golder Associates Inc., on behalf of Nailite International Inc., is requesting qualified air testing firms to submit a lump sum bid for conducting the required compliance testing as described in the Florida Department of Environmental Protection air construction permit for the new and existing spray painting line. A copy of the applicable permit conditions describing the required testing is attached to this letter to use in developing a bid.

A site tour is highly recommended and can be coordinated by contacting Mr. David Steedman of Nailite at (305) 620-6200 extension 241.

If you have any questions, please feel free to contact me at (352) 336-5600 or Mr. Steedman.

Sincerely,

GOLDER ASSOCIATES INC.

  
Benny Susi, P.E.  
Associate

BS/jkw/jkw

Attachments

cc: D. Steedman-Nailite

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Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

# Department of Environmental Protection

## PERMITTEE

Nailite International, Inc.  
1111 and 1251 N.W. 165<sup>th</sup> Street  
Miami, Florida 33169

Permit No. 0250407-003-AC (PSD-FL-289)  
Project: New Panel Spray Line and  
Relocation of Existing Line  
Expires: December 31, 2001  
Location: Miami-Dade County

## AUTHORIZED REPRESENTATIVE:

Mr. David G. Steedman, Vice President of Operations

## PROJECT AND LOCATION

This permit authorizes the applicant to construct a new plastics 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. Any increased production capacity resulting in utilization of paints and solvents in excess of 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 SIC code for this facility is 3089.

The project is located at 1111 and 1251 NW 165<sup>th</sup> 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.

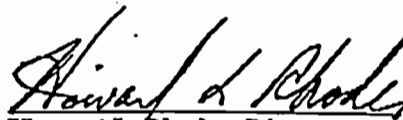
## STATEMENT OF BASIS

This construction/PSD 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 BD BACT/MACT Determination  
Appendix GC General Permit Conditions

  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

**AIR CONSTRUCTION PERMIT**  
**SECTION I. FACILITY INFORMATION**

**FACILITY DESCRIPTION**

The existing Nailite facility is located at 1251 NW 165<sup>th</sup> Street in Miami, Dade County. The proposed new plastic panel spray line (No. 2) will be located at 1111 NW 165<sup>th</sup> Street, approximately 500 feet from the existing facility. On its existing No.1 Line, Nailite manufactures and coats plastic shingles molded from polypropylene pellets. The No. 1 Line consists of three paint spray booths and eight injection molding machines. The new No. 2 Line will consist of three continuous spray booths and a curing oven. Air pollution controls will consist of a state-of-the-art Regenerative Thermal Oxidizer (RTO) for controlling VOC/HAP emissions. Within 90 days of the start-up of the new line, the existing No. 1 line will be dismantled, moved to the new location, and connected to the RTO. The existing No. 1 line may be operated for up to 18 months at the new location before it must be replaced with a new No. 3 line or brought up to the same capture and emission standards as the No. 2 Line.

Details regarding the project are described in the Technical Evaluation and Preliminary Determination issued August 4, 2000 and the determinations of Best Available Control Technology (BACT) and Maximum Achievable Control Technology (MACT) appended to this permit.

The proposed facility including the relocated No. 1 line will consist of the following emissions units.

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	No. 1 Line consisting of 3 Paint Spray Booths
002	Injection Molding Machines
003	Storage Tanks
004	No. 2 Line (3 Continuous Spray Booths and a Curing Oven)
005	No. 3 Line (3 Continuous Spray Booths and a Curing Oven)

**REGULATORY CLASSIFICATION**

The facility, consisting of the above emissions units, is classified as a Major or Title V Source of air pollution because emissions of volatile organic compounds (VOC) exceed 100 tons per year (TPY), and because emissions of one hazardous air pollutant (HAP) exceed 10 tons per year and emissions of total HAP exceed 25 tons per year. This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Since potential emissions are greater than 250 TPY for VOC, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). The emissions units are subject to limits determined as BACT for VOC and are subject to limits determined to be MACT for HAP.

**REVIEWING AND PROCESS SCHEDULE**

04-17-00	Date of Receipt of Application
05-04-00	First Request for Additional Information
06-16-00	Final Request for Additional Information
06-22-00	Date Application Complete
08-11-00	Notice of Intent Published in Newspaper

Nailite International, Inc.  
 Miami Plant

DEP File No. 0250407-003-AC  
 PSD-FL-289

**AIR CONSTRUCTION PERMIT**  
**SECTION I. FACILITY INFORMATION**

---

**RELEVANT DOCUMENTS**

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

- Permit application
- Applicant's additional information noted above
- Department's Technical Evaluation and Preliminary Determination and Intent to Issue

## AIR CONSTRUCTION PERMIT

## 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(s) *subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blainstone Road, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
2. General Conditions: The permittee is 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 December 31, 2001. The permittee, for good cause, may request that this construction/PSD 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, F.A.C.]
7. PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40CFR52.21(r)(2) and Rules 62-4.070(4), 62-4.210(2) & (3), and 62-210.300(1)(a), F.A.C.]
8. BACT Determination: In conjunction with extension of the 18 month period to commence or continue construction or extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source as applied to any new or modified emission units. [40CFR52.21(j)(4) and Rules 62-4.070(4), 62-4.210(2) & (3), 62-210.300(1)(a), and 62-212.400(6)(b), F.A.C.]

**AIR CONSTRUCTION PERMIT**  
**SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS**

9. 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.]
10. 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.]

**GENERAL EMISSIONS LIMITING STANDARDS**

11. 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.]
12. 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 reentrainment, 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.

## AIR CONSTRUCTION PERMIT

## SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

- (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.

13. 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.]

**OPERATIONAL REQUIREMENTS**

14. 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.]

15. 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.]

16. 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 can not be used to vary any NESHAP requirements from any subpart of 40 CFR 63. 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.]

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**

17. 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

## AIR CONSTRUCTION PERMIT

## SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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.]

18. 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.]
19. 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.]
20. Test Procedures shall meet all applicable requirements of Rule 62-297.310(4), F.A.C. [Rule 62-297.310(4), F.A.C.]
21. 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.
22. 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.]
23. 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.]



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24. 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.]

## REPORTING AND RECORD KEEPING REQUIREMENTS

25. 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.]
26. 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.]
27. 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.]
28. 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.]
29. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year 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**  
**SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS**

The following specific conditions apply to the following emissions units:

EMISSIONS UNIT No.	EMISSIONS UNIT DESCRIPTION
001	No. 1 Spray Coating Line (3 Paint Spray Booths and a Solvent Recovery Still)
002	Injection Molding Machines and associated Hydraulic Tanks
003	Storage Tanks
004	No. 2 Line (3 Continuous Spray Booths and a Curing Oven)
005	No. 3 Line (3 Continuous Spray Booths and a Curing Oven)

[Note: This facility is subject to PSD for VOC and MACT for HAP as indicated in the BACT/MACT Determination attached as part of this permit. All emissions units are subject to the requirements of the state rules as indicated in this permit.]

1. This permit supersedes the emission limits and control technology conditions in the existing Title V air operation permit for the existing No. 1 Spray Coating Line effective upon relocation and startup of the existing No. 1 Spray Coating Line in its new location. Emissions Units 001, 002, 003, 004, and 005 upon replacement of 001, may each operate for up to 8,760 hours/year. The facility is required to keep daily records of the operating hours.  
[Rules 62-210.200, Definitions-Potential to Emit (PTE) and 62-213.440(1)(b)1.b., F.A.C.]
2. The maximum amount of coating applied shall be 300,000 gallons per line per year. Within 90 days following the startup of spray coating on the new No. 2 Spray Coating Line (Emissions Unit 004), the existing No. 1 Spray Coating Line (Emissions Unit 001) shall be appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that its emissions are controlled along with those from Emissions Unit 004. Total hourly and annual emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) from the RTO shall be established within 45 days of receipt of the emission test results required in Specific Conditions Nos. 3 and 4 below.  
[Rules 62-4.070(3), 62-204.800(10)(d)2., and 62-210.200 (PTE), F.A.C., and BACT/MACT]
3. The air pollution control system installed shall consist of a Regenerative Thermal Oxidizer (RTO) as specified in the application and subsequent documents submitted in support thereof. The VOC/HAP capture and treatment system for Emission Unit 004 shall be designed to capture at least 95 percent of the total VOC/HAP spraying emissions calculated from a material balance while destroying at least 95 percent of emissions captured in the RTO. The same requirements, including testing as specified in Specific Condition No. 4 below, shall apply immediately to Emissions Unit 001 if it remains in operation beyond eighteen months at its new location following startup of Emissions Unit 004, and to Emissions Unit 005 if Emissions Unit 001 is replaced. Appropriate emission limits and compliance requirements for the RTO control system shall be established by the Department within 45 days following receipt of the capture and destruction efficiency test results required by Specific Condition 4 below (including a revision if and when Emissions Unit 001 is replaced by Emissions Unit 005) and shall be incorporated into the Title V permit for this facility.  
[Rules 62-4.070(3), 62-204.800(10)(d)2., and 62-212.400, F.A.C., and BACT/MACT]

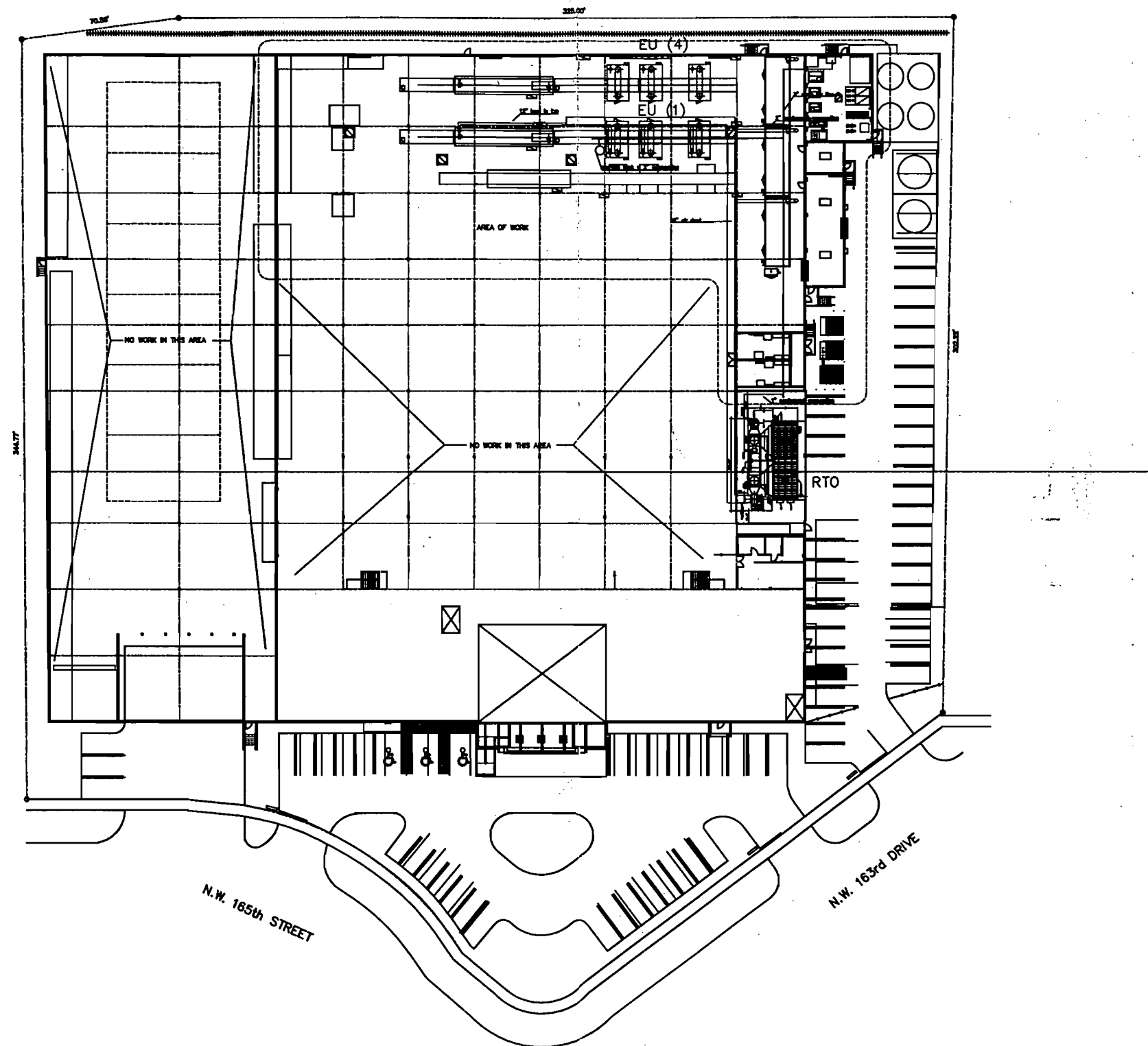
AIR CONSTRUCTION PERMIT  
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

4. Pursuant to the requirements of Specific Condition 3 above, the permittee shall demonstrate the VOC/HAP capture and destruction efficiency of Emissions Units 004 and 005 by comparing raw VOC/HAP emissions generated over a 3-hour period (based on material usage rates and appropriate emission factors) with captured emissions based on measured flow rates and VOC/HAP concentrations in the RTO inlet duct as determined by EPA Methods 2 and 18, 25 or 25A, as described in 40 CFR 60 Appendix A. A capture efficiency and destruction efficiency test shall also be performed for Emissions Unit 001 within 45 days after startup of the relocated line. A destruction efficiency test shall be performed annually on the RTO. Within 45 days following test completion, results of the above tests shall be submitted along with a complete test report to the Bureau of Air Regulation in Tallahassee, the Department's Southeast District and the Miami-Dade County Environmental Resources Management Department.  
[Rule 62-4.070(3), 62-204.800(10)(d)2., and 62-212.400, F.A.C., and MACT/BACT]
5. Testing of emissions shall be conducted annually with the emissions units operating at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emissions units may be tested at less than 90% of the maximum operating rate allowed by the permit; in this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the emissions unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C., and 40 CFR 60 Appendix A and 40 CFR 60.8, Subpart A].
6. The permittee shall continuously keep and maintain a five-year ongoing compilation of the following records to demonstrate compliance with the VOC/HAP emissions limitations of Specific Condition No. 2 of this section. Records shall be completed no later than five working days after the end of each month.
- Amounts in pounds of each material used each month that contains VOC/HAP.
  - Weight percentage of VOC/HAP in materials using the highest value listed on the Manufacturer's Safety Data Sheets.
  - Amount in pounds of VOC/HAP emitted each month from each material used during the month, calculated by multiplying the amount of each material used by its VOC/HAP content and then by the appropriate emission factor.
  - Total amount in pounds of VOC/HAP emitted each month, calculated as the sum of VOC/HAP emitted from each material used during the month as determined above.
  - Rolling 12-month total amount in pounds and tons of VOC/HAP emitted in the most recent consecutive 12-month period, calculated as the sum of VOC/HAP emitted for the current month and the preceding eleven months.
- [Rules 62-4.070(3), 62-204.800(10)(d)2., 62-212.400, F.A.C., MACT/BACT]
7. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
8. The subject emissions units shall be subject to the following:
- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to

AIR CONSTRUCTION PERMIT  
SECTION III. EMISSIONS UNITS SPECIFICS CONDITIONS

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, 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 startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700, F.A.C.]
  - Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700, F.A.C.]
  - In case of excess emissions resulting from malfunctions, each source shall notify the Department or 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, F.A.C.]
9. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(5) to the Department's Southeast District Office and the Miami-Dade County Environmental Resources Management Department by March 1 of the following year for the previous year's operation.  
[Rule 62-210.370, F.A.C.]
10. The facility shall adhere to the BACT/MACT Determination that is attached as part of this permit following this page.



Process Flow Legend	
Gas	→
Steam	→
	Covered Conveyor
	Enclosed Conveyor

Figure 2-1. Nailite Facility Drawing

00375237/F2/WP/figure 2-1.dwg 02/13/02 spk

