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
Maimi-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

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.

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

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.]

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 if 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.]

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.]

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.]

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.]

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.]

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.

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:

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

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 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 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 PPPP]

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.

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 extend 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.

Florida Department of

Memorandum 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

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] Jacks ☐ Agent ☐ Addressee

B. Received by (Printed Name) N Jacks C. Date of Delivery 3/16/05

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7000 1670 0013 3110 2387

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark Here

7000 1670 0013 3110 2387

Se Mr. John Perry, VP Operation
Nailite International, Inc.
St 1111 NW 165th Street
Ci Miami, Florida 33169

PS Form 3800, May 2000 See Reverse for Instructions

NAILITE
International
The Natural Alternative

RECEIVED
MAR 04 2005
BUREAU OF AIR REGULATION

March 1, 2005

Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attn: Mr. Al Linero

RE: ISSUANCE OF FINAL AIR CONSTRUCTION PERMIT
NAILITE INTERNATIONAL, INC.
1111 NW 165TH STREET
MIAMI, FLORIDA
PERMIT NUMBER: 0250407-008-AC

Dear Mr. Linero:

Per our discussion on March 1, 2005, Nailite International, Inc. hereby waives the 90 day permit processing clock for final action on permit until March 14th, 2005, to allow sufficient time for public review and comment. Please contact me if you have any questions.

Sincerely,

John Perry
Vice President of Operations

1111 N.W. 165th Street • Miami, Florida 33169-5819 • (305) 620-6200 • FAX (305) 623-8227
www.nailite.com

NAILITE
International
The Natural Alternative

February 17, 2005

RECEIVED
FEB 18 2005
BUREAU OF AIR REGULATION

Division of Air Resources
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399

Attached is a Notarized Proof of Notice of Intent to Issue Air Construction Permit for Nailite International.

If you have any questions please give us a call at 305-620-6200 ext. 248.

Thank you,

Yvonne Jackson
Administrative Assistant
Operations Department

1111 N.W. 165th Street • Miami, Florida 33169-5819 • (305) 620-6200 • FAX (305) 623-8227
www.nailite.com

RECEIVED

FEB 18 2005

BUREAU OF AIR REGULATION

MIAMI DAILY BUSINESS REVIEW

Published Daily except Saturday, Sunday and
Legal Holidays
Miami, Miami-Dade County, Florida

STATE OF FLORIDA
COUNTY OF MIAMI-DADE:

Before the undersigned authority personally appeared O.V. FERBEYRE, who on oath says that he or she is the SUPERVISOR, Legal Notices of the Miami Daily Business Review f/k/a Miami Review, a daily (except Saturday, Sunday and Legal Holidays) newspaper, published at Miami in Miami-Dade County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT - NAILITE INTERNATIONAL, INC.

in the XXXX Court,
was published in said newspaper in the issues of

02/11/2005

Affiant further says that the said Miami Daily Business Review is a newspaper published at Miami in said Miami-Dade County, Florida and that the said newspaper has heretofore been continuously published in said Miami-Dade County, Florida, each day (except Saturday, Sunday and Legal Holidays) and has been entered as second class mail matter at the post office in Miami in said Miami-Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this

11 day of FEBRUARY , A.D. 2005

(SEAL)

O.V. FERBEYRE personally known to me

Maria I. Mesa
My Commission DD293855
Expires March 04, 2008

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NAILITE INTERNATIONAL, INC. MIAMI-DADE COUNTY DEP FILE NO.: 0250407-008-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit Modification to Nailite International, Inc. for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new location. The final collection and destruction requirements for a previously issued case-by-case Maximum Achievable Control Technology (MACT) were determined for Line 2. The applicant location and mailing address is Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

Nailite manufactures molded plastic panels from polypropylene pellets and coats them in a series of paint booths. The previously issued permit specified the capture of volatile organic compounds (VOC) from the Line 2 and their destruction in a Regenerative Thermal Oxidizer (RTO). Relocation and operation of the previously uncontrolled Line 1 was temporarily authorized provided it was connected to the new RTO. The Department required improvements to vapor collection systems and efficiency testing for both lines prior to final authorization of the permanent operation of Line 1.

In late 2003 and early 2004, Nailite enclosed open areas in Lines 1 and Line 2 to capture the flashed off solvent, and convey the air/solvent mixture to the RTO. Nailite also conducted performance testing to determine the capture and destruction efficiencies of the collection and destruction system. This information was used to set final permit conditions for both lines including final emission requirements for the MACT determination conducted in 2000. The control requirements for the old Line 1 are 70 and 97 percent collection and destruction efficiency respectively. The case-by-case MACT requirements for the new Line 2 are 90 and 97 percent respectively.

This permit replaces an applicable VOC limit of 6 pound per gallon of paint with a 249 tons per year (TPY) limit on total VOC emissions from the facility. The annual limit in conjunction with the collection and control by the RTO system is much more restrictive because it represents much fewer emissions on a pounds per gallon basis.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Modified Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in the proceeding.

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.

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 indicated; (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 of the Florida Administrative Code.

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
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Miami-Dade County Department of
Environmental Resources Mgmt.
33 S.W. 2nd Avenue, Suite 900
Miami, Florida 33130-1540
Telephone: 305/372-6925
Fax: 305/372-6954

Dept. of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33416-5425
Telephone: 561/681-6600
Fax: 561/681-6755

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, South Permitting at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information.

2/11 05-4-35/521278M

NAILITE International
The Natural Alternative

FAX

To: Patty Adams	**From:** Yvonne Jackson
Fax: 850-921-9533	**Pages:** 4 Including cover sheet
Phone: 850-921-9505	**Date:** February 22, 2005
Re: Publication Proof	**CC:**

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

• **Comments:**

As requested. Here is a copy of letter and Proof That was Sent To you.

Thanks for your help.

Yvonne.

1111 N.W. 165th Street • Miami, Florida 33169-5819 • (305) 620-6200 • FAX (305) 623-8227
www.nailite.com

NAILITE
International
The Natural Alternative

February 17, 2005

Division of Air Resources
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399

Attached is a Notarized Proof of Notice of Intent to Issue Air Construction Permit for Nailite International.

If you have any questions please give us a call at 305-620-6200 ext. 248.

Thank you,

Jackson

Yvonne Jackson
Administrative Assistant
Operations Department

Delivered on 2/18/05 at 8:51 Am

1111 N.W. 165th Street • Miami, Florida 33169-5819 • (305) 620-6200 • FAX (305) 623-8227
www.nailite.com

MIAMI DAILY BUSINESS REVIEW

Published Daily except Saturday, Sunday and Legal Holidays
Miami, Miami-Dade County, Florida

STATE OF FLORIDA
COUNTY OF MIAMI-DADE:

Before the undersigned authority personally appeared O.V. FERBEYRE, who on oath says that he or she is the SUPERVISOR, Legal Notices of the Miami Daily Business Review f/k/a Miami Review, a daily (except Saturday, Sunday and Legal Holidays) newspaper, published at Miami in Miami-Dade County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT - NAILITE INTERNATIONAL, INC.

In the XXXX Court,
was published in said newspaper in the issues of

02/11/2005

Affiant further says that the said Miami Daily Business Review is a newspaper published at Miami in said Miami-Dade County, Florida and that the said newspaper has heretofore been continuously published in said Miami-Dade County, Florida, each day (except Saturday, Sunday and Legal Holidays) and has been entered as second class mail matter at the post office in Miami in said Miami-Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this

11 day of FEBRUARY A.D. 2005

(SEAL)

O.V. FERBEYRE personally known to me

Maria I. Mesa
My Commission DD263852
Expires March 04, 2008

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NAILITE INTERNATIONAL, INC. MIAMI-DADE COUNTY DEP FILE NO.: 0250407-008-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit Modification to Nailite International, Inc. for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new location. The final collection and destruction requirements for a previously issued case-by-case Maximum Achievable Control Technology (MACT) were determined for Line 2. The applicant location and mailing address is Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

Nailite manufactures molded plastic panels from polypropylene pellets and coats them in a series of paint booths. The previously issued permit specified the capture of volatile organic compounds (VOC) from the Line 2 and their destruction in a Regenerative Thermal Oxidizer (RTO). Relocation and operation of the previously uncontrolled Line 1 was temporarily authorized provided it was connected to the new RTO. The Department required improvements to vapor collection systems and efficiency testing for both lines prior to final authorization of the permanent operation of Line 1.

In late 2003 and early 2004, Nailite enclosed open areas in Lines 1 and Line 2 to capture the flashed off solvent, and convey the air/solvent mixture to the RTO. Nailite also conducted performance testing to determine the capture and destruction efficiencies of the collection and destruction system. This information was used to set final permit conditions for both lines including final emission requirements for the MACT determination conducted in 2000. The control requirements for the old Line 1 are 70 and 97 percent collection and destruction efficiency respectively. The case-by-case MACT requirements for the new Line 2 are 90 and 97 percent respectively.

This permit replaces an applicable VOC limit of 6 pound per gallon of paint with a 249 tons per year (TPY) limit on total VOC emissions from the facility. The annual limit in conjunction with the collection and control by the RTO system is much more restrictive because it represents much fewer emissions on a pounds per gallon basis.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Modified Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in the proceeding.

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.

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 indicated; (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.

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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
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Miami-Dade County Department of
Environmental Resources Mgmt.
33 S.W. 2nd Avenue, Suite 900
Miami, Florida 33130-1540
Telephone: 305/372-6925
Fax: 305/372-6954

Dept. of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33416-5425
Telephone: 561/681-6600
Fax: 561/681-6755

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, South Permitting at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information.

2/11 05-4-36/521278M

FedEx Express
Customer Support Trace
3875 Airways Boulevard
Module H, 4th Floor
Memphis, TN 38116

U.S. Mail: PO Box 727
Memphis, TN 38194-4643

Telephone: 901-369-3600

02/22/2005

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **842709746830**. Our records reflect the following information.

Delivery Information:

Signed for by: T.HERRING

Signature Image

Delivery Location: 2600 BLAIR STONE RD MAIL STATI
Delivery Date: Feb 18, 2005 08:51

Shipping Information:

Tracking number: 842709746830

Ship Date: Feb 17, 2005
Weight: 1.0 lbs.

Recipient:
DIVISION OF AIR RESOURCES
2600 BLAIR STONE RD MAIL STATI
32399
US

Shipper:
YVONNE JACKSON
NAILITE INTERNATIONAL
1111 NW 165TH ST
331695819
US

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- By Email Tr
- By FedEx V Solutions

Tracking number	842709746830	**Delivered to**	Mailroom
Signed for by	T.HERRING	**Service type**	Priority Overnight
Ship date	Feb 17, 2005	**Weight**	1.0 lbs.
Delivery date	Feb 18, 2005 8:51 AM		
Status	Delivered		

Date/Time		Activity	Location
Feb 18, 2005	8:51 AM	**Delivered**	
	7:49 AM	On FedEx vehicle for delivery	TALLAHASSEE, FL
	7:30 AM	At local FedEx facility	TALLAHASSEE, FL
	7:06 AM	At dest sort facility	TALLAHASSEE, FL
	3:38 AM	Departed FedEx location	MEMPHIS, TN
	12:01 AM	Departed FedEx location	MEMPHIS, TN
Feb 17, 2005	11:25 PM	Arrived at FedEx location	MEMPHIS, TN
	8:37 PM	Left origin	NORTH MIAMI BEACH, FL
	8:33 PM	Package data transmitted to FedEx	
	3:48 PM	Picked up	NORTH MIAMI BEACH, FL

Details

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Reduce future mistal
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FedEx has LTL, air surface and air exp multi piece packag and ocean freight.

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Enter your email, submit up to three email addresses (separated by commas), add your message (optional), and click **Send email**.

From

To

Add a message to this email.

Send email

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

January 28, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0250407-008-AC
Construction Permit Modification – Permanent Operation of Line 1
Final Line 1 and Line 2 Emission Controls and Limits

Dear Mr. Perry:

Enclosed is one copy of the Department's Intent to Issue an air construction permit modification to Nailite for the installation of a new panel line and an existing panel line at its new location at 1111 NW 165th Street, Miami, Dade County. The modification will extend the expiration date of the present permit and alleviate the requirement to shutdown the old line. The draft air construction permit modification, the Technical Evaluation and Preliminary Determination, and the Public Notice of Intent to Issue Air Construction Permit Modification are attached.

The Public Notice must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, Administrator, South Permitting Section at the above letterhead address. If you have any other questions, please contact Ms. Cindy Mulkey at 850-921-8968 or Mr. Linero at 850/921-9523.

Sincerely,

Trina L Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/cm

Enclosures

In the Matter of an
Application for Permit Modification by:

John Perry, Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

DEP File No. 0250407-008
Panel Spray Lines 1 and 2
Final Emission Controls
Miami-Dade County

_____/

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of draft permit modification) for a previously approved permit for the reasons stated below.

The applicant, Nailite International, Inc., applied on June 15 (complete November 1), 2004 to the Department for modification of the previously issued air construction permit that provided for installation of a new paint line at, and relocation of an existing line to 1111 NW 165th Street, Miami, Dade County. Nailite requested authorization for permanent operation of Line 1; to use results from emissions testing (conducted March 2004) to establish capture and destruction efficiency requirements; to modify certain emission limitations for volatile organic compounds (VOCs); and to re-designate two qualifying emissions units as insignificant.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification is required.

The Department intends to issue this air construction permit modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit Modification. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit modification issuance action for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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.

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.

Executed in Tallahassee, Florida.

Trina L Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit Modification (including the Public Notice, Technical Evaluation, and the Draft Permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/28/05 to the person(s) listed:

Howard Wasserman *
John Perry *
Scott McCann, P.E., Golder Associates
Renee Weaver, Golder Associates
Bruce Offord, SED
Patrick Wong, Miami-Dade DERM
Gregg Worley, EPA

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.

Barbara J. Friday 1/28/05
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

FLORIDADEPARTMENT OF ENVIRONMENTAL PROTECTION

Nailite International, Inc.
Miami-Dade County

DEP File No.: 0250407-008-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit Modification to Nailite International, Inc. for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new location. The final collection and destruction requirements for a previously issued case-by-case Maximum Achievable Control Technology (MACT) were determined for Line 2. The applicant location and mailing address is Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

Nailite manufactures molded plastic panels from polypropylene pellets and coats them in a series of paint booths. The previously issued permit specified the capture of volatile organic compounds (VOC) from the Line 2 and their destruction in a Regenerative Thermal Oxidizer (RTO). Relocation and operation of the previously uncontrolled Line 1 was temporarily authorized provided it was connected to the new RTO. The Department required improvements to vapor collection systems and efficiency testing for both lines prior to final authorization of the permanent operation of Line 1.

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This permit replaces an applicable VOC limit of 6 pound per gallon of paint with a 249 tons per year (TPY) limit on total VOC emissions from the facility. The annual limit in conjunction with the collection and control by the RTO system is much more restrictive because it represents much fewer emissions on a pounds per gallon basis.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Modified Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

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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.

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Dept. of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Miami-Dade County Department of Environmental Resources Mgmt. 33 S.W. 2nd Avenue, Suite 900 Miami, Florida 33130-1540 Telephone: 305/372-6925 Fax: 305/372-6954	Dept. of Environmental Protection Southeast District Office 400 North Congress Avenue West Palm Beach, FL 33416-5425 Telephone: 561/681-6600 Fax: 561/681-6755

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NOTICE TO BE PUBLISHED IN THE NEWSPAPER

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

NAILITE INTERNATIONAL, INC.
MIAMI, DADE COUNTY

Vinyl Siding Manufacturing and Coating Facility
Control Efficiencies Lines 1 and 2.
Permanent Operation of Line 1

DEP File No. 0250407-008-AC

Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

January 28, 2005

I. APPLICANT NAME AND ADDRESS

Nailite International, Inc.
111 NW 165th Street
Miami, Florida 33169

II. FACILITY INFORMATION

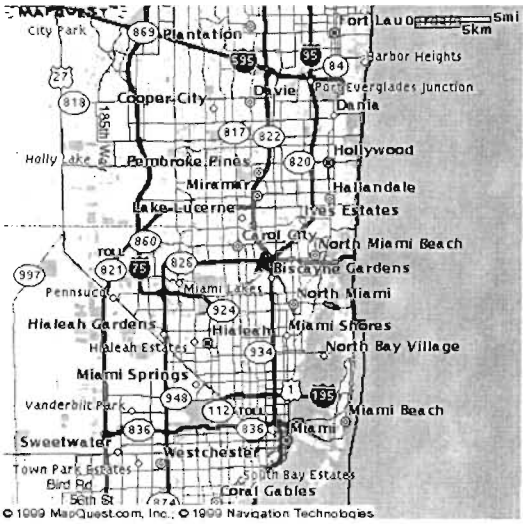
Authorized Representative: John Perry, Vice President of Operations

Application Review Schedule

Date of Receipt of Application	June 22, 2004
Date Application Complete	November 1, 2004
Intent Issued	January 26, 2005

A. FACILITY LOCATION

This facility is located at 1111 NW 165th Street in Miami, Dade County. The UTM coordinates of the site are Zone 17, 578.4 km East and 2867.2 km North.



Regional Map Showing Miami Area

Nailite International Facility Location

B. FACILITY CLASSIFICATION CODES (SIC)

Industry Group No.	30	Plastic Products
Industry No.	3089	All Other Plastic Products Manufacturing

C. FACILITY CATEGORY/APPLICABILITY

The existing facility is a Major or Title V Source of air pollution because emissions of VOC exceed 100 TPY or because emissions of a hazardous air pollutant (HAP – e.g. toluene) exceed 10 TPY. Emission Unit 004 (Line No. 2) was constructed in 2000 and subject to a case-by-case Maximum Achievable Control Technology Determination in accordance with 40 CFR 63, Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(g) and 112(j), adopted as Rule 62-204.800(10)(d)2, F.A.C.

Emission Units 001 and 004 (Lines 1 and 2) are subject to 40 CFR 63, Subpart PPPP for Surface Coating of Plastic Parts. Because the units at this facility were constructed or began construction before December 4, 2002, this facility is considered an existing source and Lines 1 and 2 have until April 19, 2007 to meet the more stringent Federal MACT standard. In the meantime, line 2 must continue to comply with the case-by-case MACT determination.

Because Nailite is a major source of VOC and located in Dade County, the facility was subject to the Reasonably Available Control Technology (RACT) provisions of 62-296.570, F.A.C. In December of 1994, Nailite proposed a VOC emission limit of 6.0 lb VOC/gal of applied coating as the RACT standard for line 1. This value was included in subsequent operation permits including Title V, but was not incorporated into an industry-specific rule.

Prior to construction of Line 2, this was also a Major Facility with respect to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), because emissions of volatile organic compounds (VOC) exceeded 250 tons per year (TPY). A case-by-case determination of best available control technology (BACT) was conducted and issued with the MACT determination as a single MACT/BACT.

Following collection and destruction of vapors from previously uncontrolled Line 1, the facility was no longer a Major Facility with respect to PSD. This is reflected in a permit issued to Nailite in December 2002. This facility is now a synthetic minor facility with respect to PSD.

The emission units affected by this permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

Chapter 62-4	Permits.
Rule 62-204.800	Federal Regulations Adopted by Reference (40CFR63 in Particular)
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-213	Operation Permits for Major Sources of Air Pollution
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-296.570	Reasonably Available Control Technology (RACT) – VOC and NO_X
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods

III. ORIGINAL PROJECT

The Florida Department of Environmental Protection (Department) issued a permit to Nailite in September 2000 to construct a spray coating line (Line No. 2). BACT/MACT was determined to be VOC/HAP emission control by a regenerative thermal oxidizer (RTO) air pollution control system designed with an overall capture and destruction efficiency of 90 percent. Final BACT and MACT control requirements were to be established by subsequent testing of the system built to the design specifications cited.

Nailite connected Line 1 to the same RTO. Final non-BACT/MACT control efficiencies were also to be established by subsequent testing. Following is a brief project description.

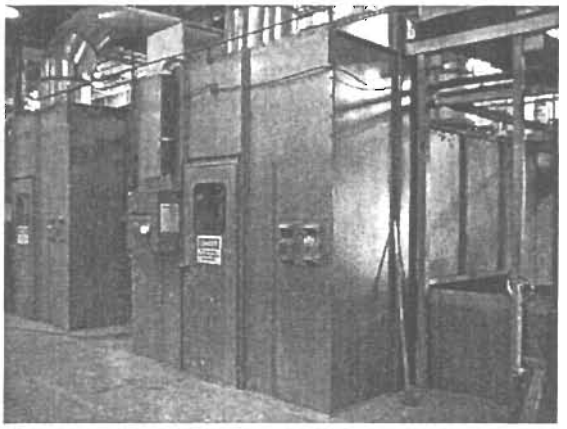
Nailite manufactures vinyl siding and shingles used for architectural and construction applications. The products are manufactured, coated, and packaged at the facility for shipping off site. The major equipment at the plant includes the two spray coating lines each with three spray booths and a curing oven, nine injection molding machines, and two storage silos. Air pollution controls consist of nearly total capture of vapors and an RTO for controlling VOC/HAP emissions. The following pictures show the external features of the operation.

Nailite Vinyl Panel Manufacturing Facility

Raw Material (Polypropylene) Storage

The following pictures depict some of the internal features of the facility

Injection Molding Machine



Paint Spray Booth

IV. CURRENT PROJECT

Nailite has requested authorization for permanent operation of and to modify RACT emission requirements for Line 1, to use results from emissions testing (conducted March 2004) to establish capture and destruction efficiency requirements, and to re-designate two qualifying emissions units as insignificant.

A. CONTINUED OPERATION OF LINE NO.1

Nailite has requested an air construction permit to allow permanent operation of Line 1 and to set collection and destruction efficiencies for Lines 1 and Line 2.

The following table shows historical emissions reported by Nailite for Line 1. Emissions were uncontrolled prior to installation of the RTO and were clearly indicative of a Major Facility with respect to PSD and a Major Source with respect to VOC and HAPs.

YEAR/Line	VOC Emissions TPY	HAPS Emissions (TPY)	Hours of Operation
1985 Line 1	228		2080
1994 Line 1	352		3936
1995 Line 1	315		3936
1996 Line 1	215		2892
1997 Line 1	221		3239
1998 Line 1	273		3758
1999 Line 1	366	334	3952
2000 Line 1	518	471	5568
2001 Line 1&2	313	290	5480
2002 Line 1&2	148	113	7280
2003 Line 1&2	143	118	7280
2004 (Jan-Aug)	96	88	

Source: DEP's database: ARMS and Applicant information dated October 15, 2004.

B. CAPTURE AND DESTRUCTION EFFICIENCY REQUIREMENTS

Nailite has requested an air construction permit modification to set final capture and destruction efficiency requirements for the RTO system as required by the initial construction permit. Spray line No. 2 was to be designed and constructed with an overall capture and destruction efficiency of at least 90 percent. However, testing of the line following initial construction resulted in a capture efficiency of only 81.5 percent. In order to increase VOC capture efficiency of the system, Nailite underwent a series of improvements totaling approximately $400,000 that were required by a Compliance Plan that was incorporated into their Title V Operation Permit issued August 2003. Following is a list of changes required by the Compliance Plan:

1) Enclose the following existing open areas in Paint Line 1 to capture the flashed off solvent, and send the air/solvent mixture to the RTO:
   a) The conveyor system between the booths.
   b) The conveyor system between the final paint booth and the entrance of the curing oven.
   c) Infrared curing oven.
   d) The conveyor cleaning system.

2) Enclose the following existing open areas in Paint Line 2 to capture the flashed off solvent, and send the air/solvent mixture to the RTO:
   a) The conveyor system between the booths.
   b) The conveyor system between the final paint booth and the entrance of the curing oven.
   c) The conveyor cleaning system.

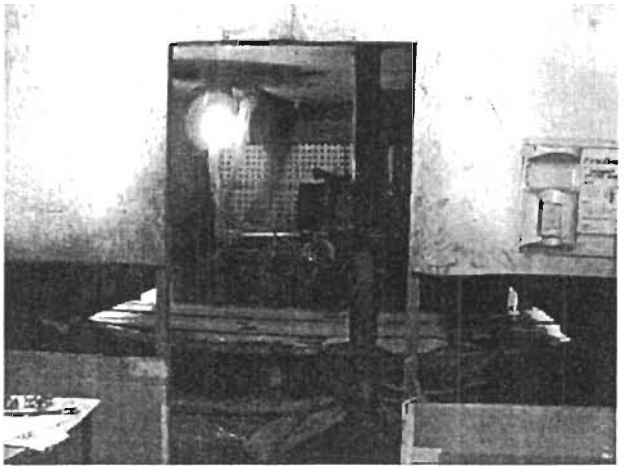
Nailite was required to make the necessary modifications to improve collection of VOC vapors from Paint Lines 1 and 2. After making system modifications, Nailite was required to conduct performance testing to determine the capture and destruction efficiencies of the RTO System and submit the applicable test results to the DERM and DEP.

Following are the changes actually made by Nailite.

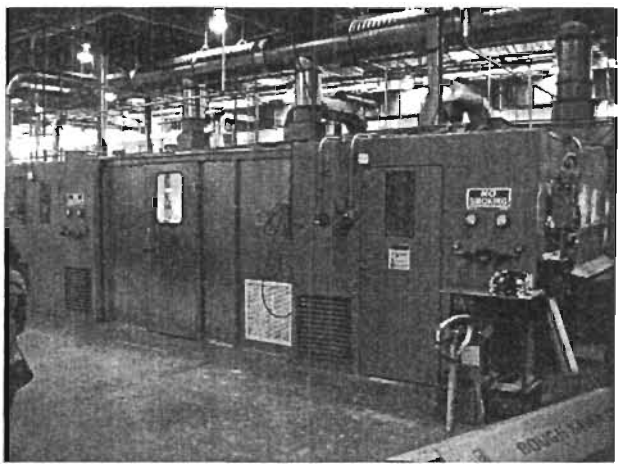
1) All open sections of the conveyor on Paint Lines No. 1 and No. 2 were enclosed to eliminate any "flashing-off" of emissions in exposed areas of the paint process lines.
2) All new enclosed areas were exhausted to the RTO.
3) Manned booths were added to Paint Lines No.1 and No. 2 to capture emissions created during the hand spraying (highlighting) operation that was previously done in the open air without any capture.
4) The radiant-heat oven associated with Paint Line No.1 was replaced with a new gas oven that captures emissions and exhaust to the RTO.
5) Old ductwork associated with Paint Line No. 1 was replaced with more efficiently designed ductwork.

Additionally, in an attempt to reduce volatile organic compound (VOC) emissions on the front-end of the painting process, Nailite has recently incorporated the use of high-solids (low solvent) paints. It is anticipated that high-solids paints will eventually be utilized for one hundred percent (100%) of the painting operations.

The following figures show some of the improvements needed and made to Line 1. Previously only some of the booths were enclosed and vapors flashed off between the booths were not collected.

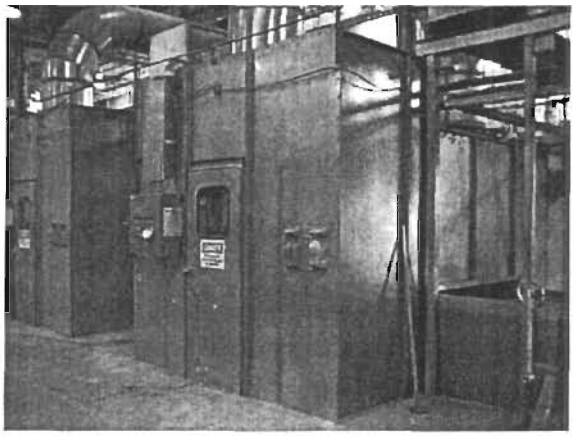


Line 1, Spray Booth 3 - Before

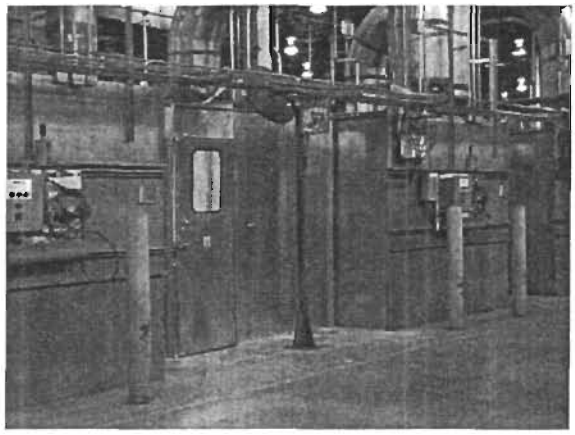


Line 1, Booths 1 and 2, Flash-off Area - After

All booths on Line 2 were already enclosed. The following figures show an example of the enclosure of the flash-off area between two of the booths.

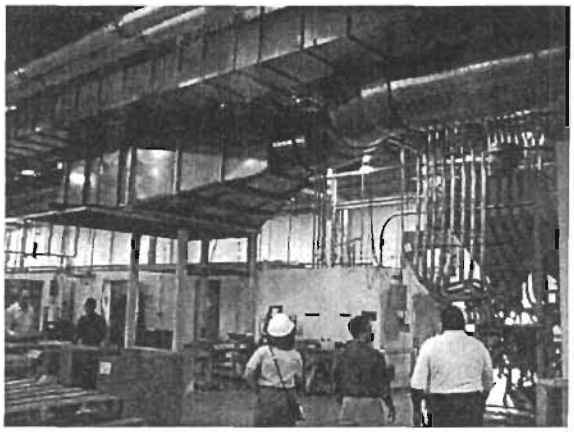


Line 2, Spray Booths 1 and 2 - Before



Line 2, Spray Booths 1 2 and 3, - After

The additional vapor collection combined with the existing high quality duct work shown below amounts to nearly total enclosure of the VOC sources. The ductwork shown conveys the vapors to the RTO system for final destruction. Testing of the complete collection and destruction was conducted in March of 2004. The testing company's sampling trailer is also shown below.



Extensive Duct Work System to RTO

Mobile Air Emissions Testing Unit

As expected, facility improvements did result in improved capture efficiency of line No. 2. Capture and destruction efficiency testing was performed in March of 2004 yielding a capture efficiency increase to 91.4 percent from 81.5 percent as previously tested. The destruction efficiency of the RTO was measured at 99.18 percent.

The capture efficiency of Line No. 1 averaged 72.72 percent during the most recent testing conducted in March. A summary of test results are shown below.

Date	Capture Efficiency Line No. 1	Capture Efficiency Line No, 2	RTO Destruction Efficiency
January 2003	84.8	81.5	99.54
March 2004	72.72	91.4	99.18

The phenomenon of low capture efficiency as exhibited by spray line No. 1 is not consistent with a near total enclosure. The applicant and their consultants theorize that the newly installed gas oven that replaced the old radiant oven on paint line No. 1 oxidizes some of the collected VOC prior to reaching the RTO.

Air is pulled into the oven and passes across the gas-fired burner, where it is heated to the temperature set point. This air is then forced onto the panels, aiding in the paint curing process. After the heated air is pushed onto the panels, the fan, located in the middle and top of the oven, pulls the majority of the air back into the oven, where it again passes over the burner. During each cycle, a portion of the return air is not re-circulated. This air is sent to the RTO.[1]

Line No. 2 differs from Line No. 1 in that fresh ambient air passes over electric heating elements. This heated air is pushed onto the painted panels. The air is then circulated to the opposite end of the oven, where the majority of it enters the ductwork leading to the RTO. Therefore, the majority of flashed-off solvent would be sent to the RTO.[2]

Department employees visited the facility in May and December of 2004. In contrast to visits prior to the improvements, few odors were detected and overall there was every indication of good capture. The test results indicate high efficiency destruction. The theory proposed for the apparent low capture on Line 1 appears like a reasonable explanation. Nailite may elect to submit a request for an Alternative Sampling Procedure (ASP) to demonstrate the theorized greater collection efficiency of Line 1.

C. FINAL CAPTURE AND DESTRUCTION EFFICIENCY VALUES

The Department has determined that Nailite has submitted adequate information allowing the Department to:

1. Set the final emission limits for the case-by-case MACT previously conducted on line 2.
2. Set the reasonable final emission limits on Line 1 that will allow operation of the facility as a non-Major Facility with respect to the PSD rules (synthetic minor).

The values proposed by Nailite based on the test program and with a margin of safety are as follow:

Proposed Capture and Destruction Efficiencies

Line No.	Capture Efficiency	RTO Destruction Efficiency
Spray Line No. 1	70%	95%
Spray Line No. 2 (MACT)	90%	95%

The proposed values for Line 1 are acceptable. Based on the testing and requirements to adhere to MACT on Line 2, the Department believes that a value of 97 percent RTO destruction efficiency is more appropriate than the one proposed by Nailite.

D. STATUS OF RACT REQUIREMENT

Rule 62-296.570, F.A.C, RACT Requirements for Major VOC and NO_x emitting Facilities, establishes NO_X and VOC emission limits for various source types. Nailite and other industries in Southeast Florida were required to submit proposals in 1993 for categories of major sources for which RACT industry-specific limits had not yet been set in Rules 62.296.501-516, F.A.C.

Some of the submittals and determinations were reflected in a revision to Rule 62-296.570, F.A.C. These include for example determinations for cement plants, resin coating, carbonaceous fuel burning, oil-fired diesel generators, certain categories of power plants, etc.

On January 3, 1995 Nailite submitted a proposal for RACT of 6.0 lb VOC/gallon of applied coating pursuant to the requirement in 62-296.570, F.A.C. that was incorporated into subsequent permits but not incorporated into any rule category. The limit was requested without further control such as collection and destruction by an RTO system.

Nailite requests deletion of the 6 lb VOC/gallon of coating requirement. This limit is to be replaced with a 249 tons per year (TPY) limit on total VOC emissions from the facility and with the collection and destruction efficiencies specified by the Department. The new limit is much more restrictive because the collection and control by the RTO system represents much fewer emissions on a pounds per gallon basis.

This request will be incorporated into this construction permit and will replace their previous RACT proposal which was never put into rule. This current request is not a specific RACT proposal per se however it more than meets the intent of the original RACT rules for Southeast Florida. This request is also consistent with the facility's classification as a non-major (synthetic minor) facility with respect to PSD.

E. UNIT RECLASSIFICATION

Nailite has requested that the injection molding machines and associated oil tanks (EU 002), and the storage silos (EU 003) be re-designated as insignificant emissions units. According to the facility the injection molding machines are closed units. The molding operations include the injection of a high viscous liquid colorant into the pellet blend, plasticizing of the blend, and molding to the desired form. According to the Material Safety Data Sheets (MSDS), the colorant and polypropylene pellets do not contain VOCs or HAPs. Therefore, this unit is assumed to have negligible emissions and would qualify for the generic emission unit exemption in Rule 62-210.300(3)(b)1.b, F.A.C. The oil tanks are integrated into the machines and serve to provide machine lubrication. In addition to the generic emission unit exemption, Nailite also proposed that the tanks qualify for a categorical exemption under Petroleum Lubrication Systems, established in Rule 62-210.300(3)(a)30, F.A.C.

The polypropylene storage silos are currently equipped with a vacuum pump/filter system to protect process equipment such as pipes from particulate buildup. The intent of the particulate control is not to control particulate matter from emitting into the atmosphere because the pellet system is a closed system with no points of emissions (with the exception of the baghouse, which

is considered negligible). Nailite proposes that the silos qualify for the generic emission unit exemption in Rule 62-210.300(3)(b)1.b, F.A.C.3

The Department agrees that the injection molding machines and storage silos qualify for the generic emission unit exemption and that the oil tanks qualify for the categorical exemption above as stated by Nailite.

V. CONCLUSION

Nailite has completed the required testing as specified in earlier construction permits. For Line No. 2, MACT for VOC/HAP emissions is determined to be the use of an RTO designed to capture and control these emissions from the new spray booths and curing oven. The control system shall demonstrate no less than 90 percent capture efficiency and no less than 97-percent destruction efficiency.

Emission units 002 and 003, injection molding machines and storage silos respectively, will be re-classified as insignificant emissions units.

Total Emissions of VOCs from the facility will be limited to 249 TPY by maintaining capture and destruction efficiencies of the RTO system required by the Department. This more restrictive limit will replace the existing 6 lb VOC/gallon of coating RACT requirement on Line 1.

The facility is now a non-major source with respect to the PSD rules. The Department has reasonable assurance that the facility will not cause or contribute to any violations of the ambient air standards and increments.

The Department will issue the attached draft permit that will replace the previous ones issued for construction of Line 2 and relocation of Line 1. Conditions to insure compliance with the non-major designation (synthetic minor) for PSD are included.

REFERENCES

[1] CRB Request to revise permit 0250407-005-AC, Attachment B, June 15, 2004
[2] CRB Request to revise permit 0250407-005-AC, Attachment B, June 15, 2004
[3] Golder Associates Letter to FDEP, Response To Verbal Request For Additional Information, of October 15, 2004.

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:	May 30, 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

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. 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
X-XX-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
- Department's request for additional information of August 2, 2004
- Applicant's additional information November 1, 2004
- Department's Technical Evaluation and Maximum Achievable Control Technology (MACT) January 24, 2005
- Department's Notice of Intent to Issue January 28, 2005

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.]

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 if 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.]

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.]

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.]

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.]

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
002	9 Injection Molding Machines/Oil Tanks[1]
003	2 Storage Silos equipped with vacuum pump/filter systems[2]
004	Coating Line No. 2 consists of 3 spray booths, and an electric curing oven

[Note: This facility is subject to MACT for HAP as indicated in the MACT Determination attached as part of this permit.]

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 1700 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.

   b) Capture efficiency of Unit 001 shall be no less than 70 percent.

   c) Capture efficiency of Unit 004 shall be no less than 90 percent.

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.]

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 annually on the RTO. [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 5 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.

    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:

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

    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 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 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 PPPP]

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.

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 extend 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 Prevention of Significant Deterioration ( ); and
(c) 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.

Table 1
Nailite International
Air Emissions

Date	1999	2000	2001	2001	2001	2002	2002	2002	2003	2003	2003	Jan-04 to Aug-04	Jan-04 to Aug-04	Jan-04 to Aug-04
Emisison Unit	EU 001	EU 001	EU 001	EU 004	Total	EU 001	EU 004	Total	EU 001	EU 004	Total	EU 001	EU 004	Total
Pollutant	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)
VOC	366	517.9	270	43.28	313.3	83.51	63.75	147.3	67.11	76.13	143.2	58.64	37.45	96.09
Toluene	332.7	468.8	246.3	39.88	286.1	62.40	47.57	110.0	52.18	59.64	111.8	51.48	32.70	84.18
Xylene*	1.93	2.20	*3.58*	*0.59*	*4.17*	1.11	0.86	1.97	1.84	2.13	3.97	1.98	1.24	3.21
Ethylbenzene	negligible	negligible	negligible	negligible	negligible	0.10	0.08	0.18	0.48	0.57	1.04	0.57	0.37	0.94
Cumene	negligible	negligible	negligible	negligible	negligible	0.28	0.22	0.50	0.29	0.32	0.61	0.16	0.10	0.26
HAPs	334.6	471.0	246.3	39.88	286.1	64.02	48.86	112.9	54.78	62.66	117.4	54.19	34.41	88.60

*values in italics were *estimated*

FIGURE 1
Nailite International
Total Air Emissions

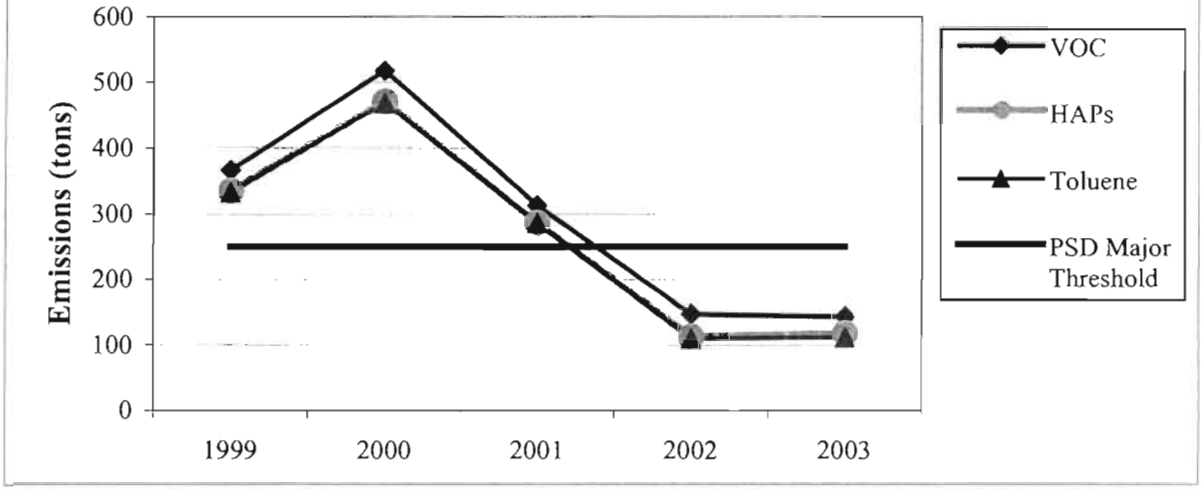


FIGURE 2
Nailite International
Air Emissions per Emission Unit

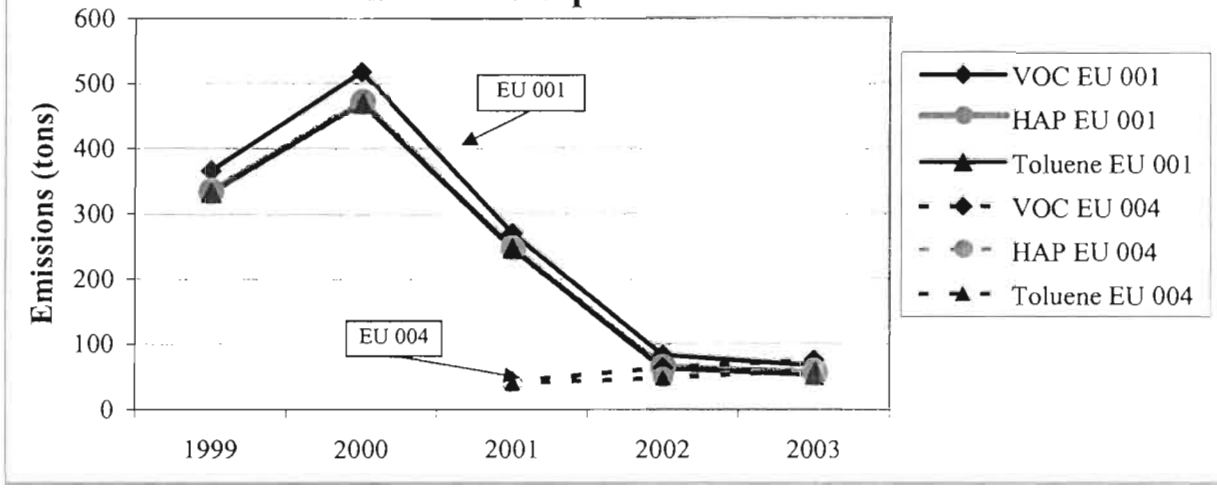
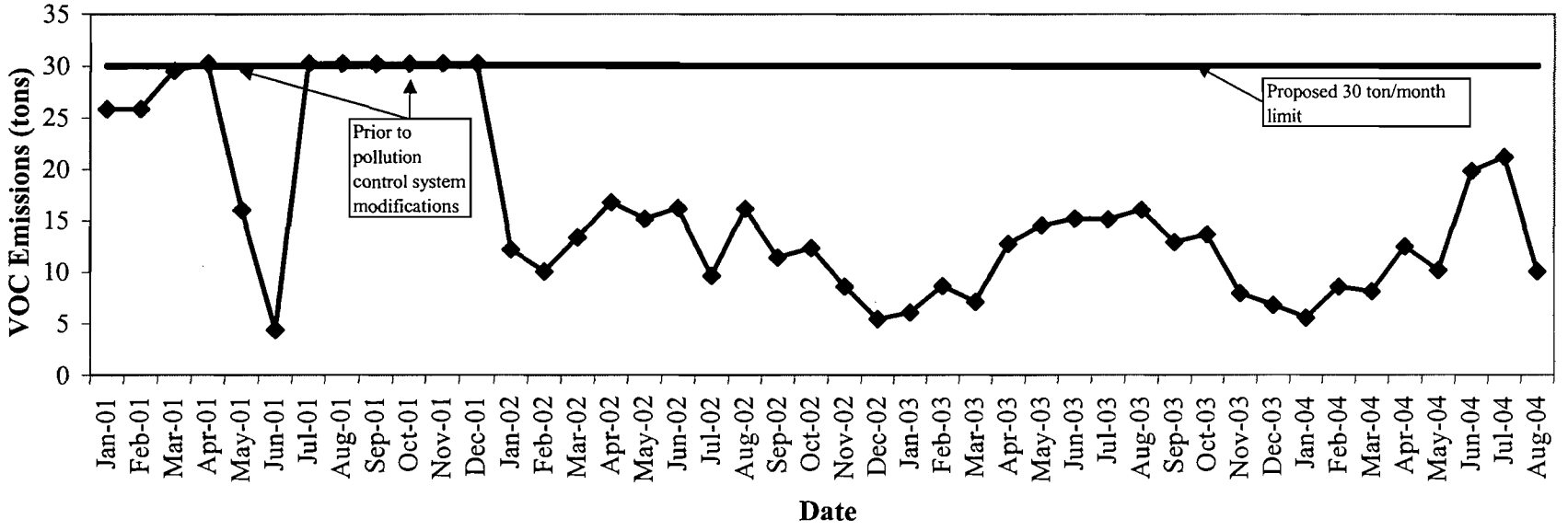


FIGURE 3
Nailite International
Monthly VOC Facility Emission Fluctuations



Test Protocol for Evaluating the Capture Efficiency of Paint Line No. 1
Nailite International, Inc.
Miami, Florida

Nailite International, Inc. (Nailite) manufactures and coats polypropylene siding for architectural and construction applications at a facility located at 1111 Northwest 165th Street, Miami, Florida. The coating operations take place in two paint lines; Paint Line No. 1 equipped with a natural gas heated drying oven and Line No. 2 equipped with an electric convection drying oven. This protocol has been developed by Koogler and Associates, Inc. of Gainesville, Florida to help in the evaluation of the solvent (primarily toluene) capture efficiency of Paint Line No. 1.

Paint Line No. 1 consists of three spray paint booths and two touch-up booths. The paint line has enclosures and an exhaust system to capture solvent released during spraying and product conveying operations. The captured solvents in the air stream and the painted product pass through a natural gas heated drying oven designed to dry the coatings applied to the product. The gas stream leaving the drying oven is directed to a regenerative thermal oxidizer (RTO) which has been measured to be 99+ percent efficient for destroying VOC. The drying oven of Line No. 1 is heated with natural gas which is fired at a rate of one million BTU per hour.

The VOC capture efficiencies of Paint Line No. 1 and Paint Line No. 2 have previously been measured by Koogler and Associates. It was found that even though the enclosures of Paint Line No. 1 and Paint Line No. 2 are similar, the measured VOC capture efficiency of Paint Line No. 1 was lower than the measured capture efficiency of Paint Line No. 2. The capture efficiencies were determined by measuring the amount of solvent (primarily toluene) in the coatings being applied in a paint line, measuring the solvent contained in the

collected over-spray and measuring the solvent in the gas stream going to the RTO. The capture efficiency was calculated as the ratio of the VOC (solvent) in the gas stream to the RTO divided by the VOC (solvent) in the applied coating materials, with a correction made for the solvent in the collected over-sprayed coating.

As the enclosures and ventilation system for VOC capture on Paint Line No. 1 and Paint Line No. 2 are similar and as the measured capture efficiency of Paint Line is lower than the measured capture efficiency of paint Line No. 2, it is suspected that some VOC is destroyed in the direct-fired natural gas heated Line No. 1 drying oven. If this is the case, the measured VOC in the gas stream to the RTO would be reduced; resulting in an apparently lowered VOC capture efficiency. This Test Protocol has been developed following consultation between Nailite and Koogler and Associates personnel to determine if there is VOC destruction in the Line No. 1 drying oven, and, if so, how much VOC is destroyed. The Test Protocol can be explained by referring to Attachment 1; a simplified process flow diagram of Paint Line No. 1.

The Test Protocol consists of two tests. Both tests involve the measurement of the mass (pounds per hour) of CO_2 in the gas stream exhausted from the No. 1 drying oven and directed to the RTO (Gas Stream C, Attachment 1). Previous measurements have shown that the total gas flow rate of Gas Stream C is approximately 20,000 standard cubic feet per minute (scfm).

In summary, Test 1 involves the measurement of CO_2 in Gas Stream C while the exhaust system of Paint Line No. 1 is operating normally and while the gas fired drying oven is operating normally but with no coating (no solvent) being applied in any of the spray booths on Line No. 1. Test 2 will be identical to the first test (i.e., the exhaust system operating normally and the gas fired oven operating normally) but with coating being applied at a normal rate. An increase in the mass of CO_2 (pounds per hour) in Gas Stream C during Test No. 2 would

demonstrate that some VOC (solvent) is destroyed in the drying oven. The magnitude of the CO_2 increase, if it occurs, can be related to the mass (pounds per hour) of VOC (solvent) destroyed in the drying oven.

Test No. 1

The exhaust system for the paint booths and the enclosed conveyor lines of Paint Line No. 1 will be operated normally however no product coating will be applied. In other words, the VOC (solvent) mass entering the natural gas heated drying oven of Line No. 1 will be zero.

The gas fired drying oven will be operated as normal. The gas firing rate to the oven will be held constant at approximately one million BTU per hour; the design gas firing rate of the oven.

Measurements will be made in the gas stream exhausted from the oven (Stream C, Attachment 1) for:

- Gas flow rate, including moisture content and temperature (dscfm),
- CO_2 (ppm, volume),
- CO (ppm, volume), and
- Methane and non-methane hydrocarbons (ppm, volume).

The gas flow rate in Gas Stream C is approximately 20,000 dscfm. The CO_2 generated by the combustion of natural gas is expected to be approximately 160 pounds per hour; equivalent to a CO_2 concentration of approximately 1180 ppm by volume in Gas Stream C (See Attachment 2).

The CO, methane and non-methane measurements will be made to provide supporting information. CO will be an indicator of incomplete combustion and

methane will be a measure of natural gas slip. Non-methane hydrocarbons should be zero.

Test No. 2

The exhaust system for the paint booths and the enclosed conveyor lines of Paint Line No. 1 will operate normally with coating applied at a typically normal rate. Based on past testing, this is equivalent to a VOC (primarily toluene) use rate of approximately 200 pounds per hour. If the capture efficiency of Line No. 1 was 100 percent, 200 pounds per hour of toluene would be entering the natural gas heated drying oven.

The gas fired drying oven will be operated as normal. The gas firing rate to the oven will be held constant at approximately one million BTU per hour; the same as the firing rate during Test No. 1.

Measurements will be made in the gas stream exhausting the oven (Gas Stream C, Attachment 1) for:

- Gas flow rate, including moisture content and temperature (dscfm),
- CO_2 (ppm, volume),
- CO (ppm, volume), and
- Methane and non-methane hydrocarbons (ppm, volume).

If 10 percent of the solvent (toluene) entering the drying oven (approximately 20 pounds per hour) is destroyed in the oven, the CO_2 concentration in Gas Stream C will increase. The CO_2 generated by the combustion of 20 pounds per hour of toluene will be approximately 67 pounds per hour; or approximately 590 ppm by volume in Gas Stream C (See Attachment 3).

The CO concentration will be an indicator of incomplete combustion. The methane concentration will be a measure of natural gas slip, and the non-methane hydrocarbon concentration will be a measure of solvent that has not been destroyed.

Method of Measurements

The flow rate of Gas Stream C will be measured in accordance with EPA Method 2, the moisture content will be measured in accordance with EPA Method 4, and measurements to determine the dry molecular weight of the gas stream will be measured in accordance with EPA Method 3.

The CO_2 measurements will be made using a gas filter correlation gas analyzer or equivalent, with full-scale ranges of zero to 100, 500, 1000, 5000, and 10,000 ppmv.

The CO measurements will be measured in accordance with EPA Method 10, and methane and non-methane hydrocarbons will be measured in accordance with EPA Method 25A.

All EPA test methods are described in 40 CFR 60, Appendix A.

Analysis of Data

The CO_2 concentration in Gas Stream C during Test No. 1 will be approximately 1180 ppmv, assuming the complete combustion of all natural gas. The measure of CO will indicate any incomplete combustion of the natural gas and the measure of methane will be an indicator of unburned methane, or natural gas slip.

The total carbon content in combustion byproducts of Gas Stream C will be calculated as the sum of the carbon in the CO_2 and CO. Any methane measured will be noted but not included as a combustion byproduct.

During Test No. 2, if 10 percent of the solvent in destroyed, the CO_2 concentration in Gas Stream C will increase by approximately 490 ppmv. Any increase in CO will be an indicator of the incomplete combustion of solvent. Methane will again be a measure of natural gas slip and will be noted but not included in the calculation of combustion byproducts. Non-methane hydrocarbons will be a measure of solvent in Gas Stream C and will be noted and compared with the solvent in the applied coating, corrected for any solvent in the collected over-sprayed coating.

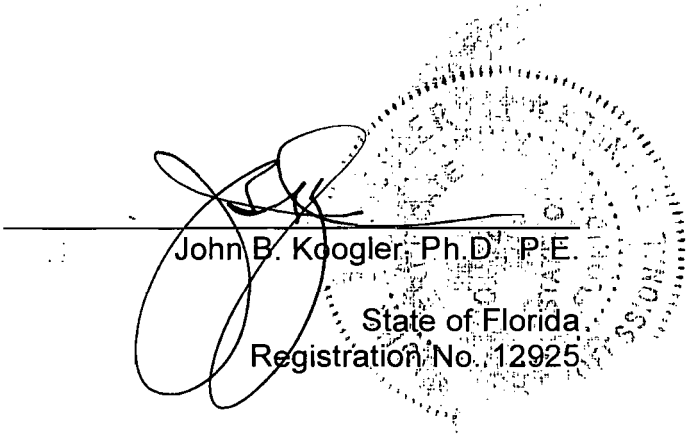
If solvent is destroyed in the drying oven of Paint Line No. 1, the CO_2 concentration in the gas stream leaving the oven (Gas Stream C) will increase by approximately 490 ppmv for each 10 percent of the applied coating solvent destroyed. An insignificant increase in CO/CO_2 in Gas Stream C will indicate that no significant solvent destruction occurs in the oven.

The mass of solvent destroyed in the drying oven, if any, will be determined by calculating the mass of carbon in the increased CO_2 concentration of Gas Stream C measured during Test No. 2 plus the mass of carbon in the increased CO concentration. This increased carbon mass will be converted to solvent mass by multiplying by the ratio of the molecular weight of the solvent (toluene) divided by the molecular weight of the carbon in the solvent.

The corrected solvent capture efficiency of Line No. 1 will be calculated as the sum of solvent destroyed in the drying oven plus the solvent remaining in Gas Stream C divided by the total mass of solvent in the applied coating, with a correction made for the solvent contained in the collected over-sprayed coating.

Certification

It is my professional opinion that the above protocol will permit an accurate determination of solvent (VOC) destruction in the natural gas fired drying oven of Paint Line No. 1 at Nailite. The sensitivity of the methods of measurement proposed herein coupled with previously measured system parameters will allow the VOC destruction efficiency in the drying oven to be determined with a reasonable degree of certainty.

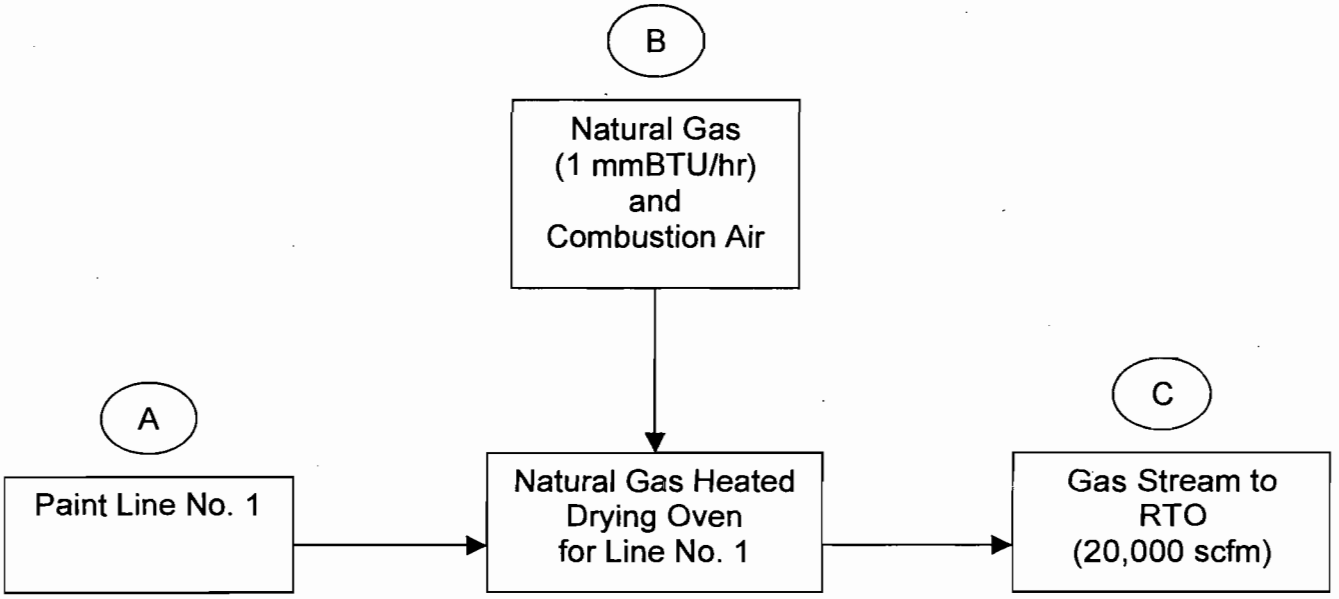


John B. Koogler, Ph.D., P.E.

State of Florida
Registration No. 12925

Attachment No. 1

Flow Diagram of Line No. 1 and Test Summary



Test 1.

- Operate exhaust fans of Line No.1 as normal, but with no paint sprayed (VOC release = zero).
- Operate Line No. 1 drying over as normal (1 mmBTU/hr gas).
- Measure flow rate (scfm) and CO_2 concentration (ppmv) of Gas Stream C (stream to RTO).
- Measure CO, methane and non-methane hydrocarbons (all ppmv) in Gas Stream C.

Test 2.

- Same operation and measurements as Test 1 but with spray booths operated as normal (release of about 200 lb/hr toluene)

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

Attachment No. 2

CO_2 from Dryer Burner Operation – Line No. 1

Burner at 1.0 mmBTU/hr fired with natural gas (assumed to be CH_4)

Gas consumption
= (10^6 BTU/hr) / (1050 BTU/cu.ft.)
= 952 cu.ft/hr
x 1 / (385 cu.ft./lb-mole) x 16 lb/lb-mole
= 39.6 lb CH_4/hr
x 12 / 16
= 29.7 lb C/hr

CO_2 generated (assume complete combustion)
= 29.7 lb C/hr
x 44 / 12
= 161.3 lb CO_2/hr
x 1 / (44 lb/lb-mole) x 385 cu. ft./ lb-mole
= 1412 cu.ft. CO_2/hr

CO_2 concentration in 20,000 scfm Gas Stream C to RTO
= (1412 cu.ft. CO_2/hr) / (20,000 cfm x 60 min/hr) x 10^6
= 1176 ppm (v/v)

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

Attachment No. 3

CO_2 from Solvent (toluene) Combustion

VOC released in Line 1 during normal operations is about 200 lb/hr as toluene (C_7H_8)

CO_2 generated from a 10 percent VOC destruction in Line 1 drying oven; the destruction of 20 lb/hr toluene

20 lb/hr toluene

x 84 / 92

= 18.3 lb C/hr

x 44 / 12

= 67.0 lb CO_2/hr

x 1 / (44 lb/lb-mole) x 385 cu. ft./lb-mole

= 586 cu.ft. CO_2/hr

CO_2 concentration in 20,000 scfm Gas Stream C to RTO

= (586 cu.ft. CO2/hr) / (20,000 cfm x 60/min/hr) x 10^6

= 488 ppm (v/v)

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

Professional Engineer Certification

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

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here ☒, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 10/14/04
Date

(seal)

*Attach any exception to certification statement. ****Board of Professional Engineers Certificate of Authorization #00001670**

Professional Engineer Certification

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

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here [X], if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 2/22/05
Date

(seal)

*Attach any exception to certification statement. ****Board of Professional Engineers Certificate of Authorization #00001670**

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John Perry
Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, FL 33169

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) [signature] C. Date of Delivery 1/31/05

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7000 2870 0000 7028 4038

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

MIAMI FL 33169

Postage	$ $1.52
Certified Fee	$2.30
Return Receipt Fee (Endorsement Required)	$1.75
Restricted Delivery Fee (Endorsement Required)	$0.00
Total Postage & Fees	$ $5.57

Postmark Here
Tallahassee FL 02Centerville Sta
JAN 28 2005
01/28/2005
USPS - 32308

7000 2870 0000 7028 4038

Sent To
Mr. John Perry, Nailite International
Street, Apt. No.; or PO Box No.
1111 NW 165th St.
City, State, ZIP+4
Miami, FL 33169

PS Form 3800, May 2000 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Howard Wasserman
President and CEO
Nailite International Inc.
1111 NW 165th St.
Miami, FL 33169-5819

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) [illegible] C. Date of Delivery 2/3/05

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7000 2870 0000 7028 4045

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE
MIAMI FL 33169

Postage	$ $1.52
Certified Fee	$2.30
Return Receipt Fee (Endorsement Required)	$1.75
Restricted Delivery Fee (Endorsement Required)	$0.00
Total Postage & Fees	$ $5.57

Tallahassee FL Centerville Postmark Here
JAN 28 2005
01/28/2005
USPS 32308

7000 2870 0000 7028 4045

Sent To Mr. Howard Wasserman, Nailite Int.
Street, Apt. No.; or PO Box No. 1111 NW 165th St.
City, State, ZIP+4 Miami, FL 33169-5819

PS Form 3800, May 2000 See Reverse for Instructions

Golder Associates Inc.

5100 West Lemon Street, Suite 114
Tampa, FL USA 33609
Telephone (813) 287-1717
Fax (813) 287-1716
www.golder.com

Golder Associates

February 23, 2005

Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Mr. Al Linero

RE: COMMENTS TO DRAFT AIR CONSTRUCTION PERMIT MODIFICATION
NAILITE INTERNATIONAL, INC.
1111 NW 165TH STREET
MIAMI, FLORIDA
PERMIT NUMBER: 0250407-008-AC

Dear Mr. Linero:

On behalf of Nailite International, Inc. (Nailite), please find below comments to the draft Air Construction Permit Modification issued on January 28, 2005. Requested revisions follow each comment.

Technical Evaluation and Preliminary Determination

1. Comment
   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.

   Requested Revision
   Delete the term vinyl and replace with polypropylene when describing the operations throughout permit documents.

2. Comment
   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.

   Requested Revision
   Replace Dade County with Miami-Dade County throughout permit documents.

3. Comment
   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 as follows:

Year/Line	VOC Emissions (TPY)	VOC Emissions (TPY)	HAPS Emissions (TPY)	HAPS Emissions (TPY)	Other
Reference	Draft Permit	Response to RAI	Draft Permit	Response to RAI	
Action		Requested Revision		Requested Revision	Requested Revision
1999 Line 1	ND	ND	334	335	ND
2001 Line 1&2	ND	ND	290	286	ND
2002 Line 1&2	148	147	ND	ND	ND
2003 Line 1&2	ND	ND	118	117	ND
2004 (Jan to Aug)	ND	ND	88	89	Insert reference to Line 1&2

ND-no discrepancy noted

4. Comment
   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.

   Requested Revision
   Revise to: Golder Associates Letter to FDEP, Response to Verbal Request for Additional Information, October 15, 2004.

Permit Statement of Basis

1. Comment
   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.).

   Requested Revision
   Revise the expiration date to July 31, 2005 to allow the facility sufficient time to prepare the Operating Permit Revision Application.

Draft Air Construction Permit 0250407-008-AC

1. Comment
   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.

   Requested Revision
   Revise to: Departments request for additional information on August 2, 2004. Additionally, reference as a verbal request for additional information.

2. Comment
   Section III, Emissions Units Specific Conditions, Emissions Unit Description. Since EU002 and EU003 were redesignated 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.

   Requested Revision
   Reference units in appropriate attachment of insignificant units and clarify reference to Footnotes 1 and 2.

3. Comment
   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.

   As reported by Ms. Cindy Mulkey, this established minimum temperature was based on a discussion with facility personnel and report of operating temperatures recorded during the compliance testing, which was conducted at greater than 90 percent maximum operating capacity. Additionally, the intent of the monitoring requirement is to provide reasonable assurance of sufficient destruction of the target pollutants.

   Requested Revision
   It is requested that the 3-hour average minimum operating temperature be reduced to 1500°F. Rational for this reduced temperature is presented below.

   The 1700°F minimum temperature restricts Nailite's operating flexibility. Although the temperature during the compliance testing was as high as 1700°F, maintaining this temperature is not considered critical to achieve the desired destruction efficiency. Rather, the higher temperature is a consequence of the VOC loading. In certain instances only one paint line may be operating, rendering a lower VOC loading to the RTO and possibly a lower combustion temperature.

The RTO was manufactured by Adwest Technologies and distributed by Airex Corporation. Per the manufacturer's operating manual, included as Attachment A:

> *As solvents enter the bed, they are oxidized and heat is released. Depending on the concentration of solvents in the process air stream, supplemental fuel in the form of natural gas injection may be used. The PLC controls the natural gas injection so as to maintain bed temperatures of approximately 1500°F and a combustion chamber temperature average of 1700°F.*

According to the RTO General Description, provided in Attachment A:

> *When the hydrocarbon laden process gas passes through the media bed and approaches the combustion chamber, its temperature rapidly increases. Due to the abundant oxygen content of the process gas, complete combustion readily occurs when the ignition point is reached in the combustion chamber, which is typically in the 1500°F to 1700°F range.*

Furthermore, according to a report published by the Environmental Protection Agency (EPA), Afterburner Systems Study, excerpts included as Attachment B, 97 percent destruction efficiency can be achieved at temperatures as low as 1200°F, given a sufficient residence time.

Additionally, a requirement to achieve 98 percent destruction efficiency, defined in the Design Data and Testing Section of the Manual is also based on a minimum solvent concentration of 123 pounds per hour. This equates to 2.05 pounds per minute. As mentioned, Nailite does not always run at 90 percent maximum capacity as required during compliance testing. There are instances where one paint line may be used for a solid colored product which may result in only two of three booths operating. However, these solid colored products run at the highest line rates/conveyor speed and therefore offset the operation of the third paint booth at slower line rates. During the capture efficiency testing each line is tested individually. The testing conducted on March 11, 2004 represents the aforementioned conditions in which a solid colored product was coated a high rate of speed, essentially 100 percent of the maximum line rate. During the three individual trials, data on the concentration levels was recorded and presented in Attachment C. Run number 1 represents the lowest amount of VOC captured during the testing. This scenario represents the lowest concentration measured and typical of a minimum operating day where only one paint line is operating. During this run, the VOCs captured in the one hour test were 127.57 pounds per hour, which yields just over the minimum referenced in the destruction efficiency guarantee of 123 pounds per hour. In summary, Nailite's minimum operations are greater than the minimum solvent concentration of 123 pounds per hour required to achieve the 98 percent destruction efficiency.

In conclusion, based on the supporting documentation, the supplemental gas requirement is triggered when bed temperatures fall below 1500°F, which results in an average of 1700°F combustion temperature. Because the average temperature of 1700°F is based on a correlation to the bed temperature and the trigger for supplemental gas is based on the temperature of the bed, 1500°F is requested as the minimum temperature. Additionally,

complete combustion readily occurs when the ignition point is reached in the combustion chamber, which is typically in the 1500°F to 1700°F range. Furthermore, as demonstrated by the compliance testing in conjunction with the manufacturer's data, the desired destruction efficiency can be achieved under Nailite's minimum operating conditions based on VOC loading and not strictly dependent upon maintaining a combustion temperature of 1700°F.

4. Comment
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).

Requested Revision
Clarify whether testing requirement is based on annual or fiscal year.

5. Comment
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.

Requested Revision
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.

Please find enclosed as Attachment D, the Professional Engineer (P.E.) Certification Statement and Responsible Official (R.O) Certification. Please consider the requested revisions and should you have any questions regarding this letter, please contact the undersigned.

Sincerely,

GOLDER ASSOCIATES

Renee Weaver, P.E.
Project Engineer

Scott A. McCann, P.E.
Associate

Attachments Attachment A-RTO Manual Excerpts
Attachment B-EPA Afterburner Systems Study Excerpts
Attachment C-Summary of Capture Efficiency Test Results
Attachment D-P.E. Certification Statement, R.O. Certification Statement

cc: Mr. John Perry, Nailite International

REW/SAM/dcg

H:\PROJECTS\2004proj\043-9535 Nailite Environmental Compliance\Permits\Revised AC Permit Comments\AC Permit Comments.doc

Adams, Patty

From: Heron, Teresa
Sent: Friday, September 10, 2004 9:48 AM
To: Adams, Patty
Subject: FW: Nailite Response to RAI Schedule

Patty: This AC application is incomplete.

-----Original Message-----
From: Weaver, Renee [mailto:rweaver@golder.com]
Sent: Monday, August 30, 2004 8:13 PM
To: Heron, Teresa
Cc: jperry@nailite.com; smcann@golder.com
Subject: Nailite Response to RAI Schedule

Ms. Heron,
Per our conversation today, the response to the FDEP's verbal Request for Additional Information (RAI) regarding the revised air construction permit application submitted in June 2004 for Nailite will be submitted within the next 3 weeks. During this time period Nailite will be evaluating the applicability of the MACT PPPP and evaluating the impact the MACT may have on permitting and compliance efforts. If you have any questions regarding this schedule, please contact me on my cell phone at (813) 299-3950 while I am out of town. I will be returning to the office on Tuesday . Thank you.
Sincerely,

Renee Weaver

CRB
GEOLOGICAL & ENVIRONMENTAL SERVICES, INC.

October 27, 2004

Mr. Al Linero
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Response to Verbal Request for Additional Information
Air Construction Permit Revision Application
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida
Permit Number: 0250407-005-AC (PSD-FL-289A)

Dear Mr. Linero:

We are pleased to forward four (4) copies of the above referenced document for your review and approval. The document was prepared by Golder and Associates (Golder) in coordination with Nailite International, Inc. (Nailite) and Koogler & Associates Environmental Services. Any questions may be directed to Golder or Nailite.

Truly yours,
CRB Geological & Environmental Services, Inc.

Victor Rossinsky, Ph.D., P.G.
Senior Project Manager

4573 PONCE DE LEON BOULEVARD • CORAL GABLES, FLORIDA 33146 • TEL.: (305) 447-9777 • FAX: (305) 567-2853

Golder Associates Inc.

5100 West Lemon Street, Suite 114
Tampa, FL USA 33609
Telephone (813) 287-1717
Fax (813) 287-1716
www.golder.com

Golder Associates

October 15, 2004

0430-9535

Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attn: Mr. Al Linero

RE: RESPONSE TO VERBAL REQUEST FOR ADDITIONAL INFORMATION
AIR CONSTRUCTION PERMIT REVISION APPLICATION
NAILITE INTERNATIONAL, INC.
1111 NW 165TH STREET
MIAMI, FLORIDA
PERMIT NUMBER: 0250407-005-AC (PSD-FL-289A)

Dear Mr. Linero:

Per the request of Ms. Teresa Heron on August 2, 2004, Florida Department of Environmental Protection (FDEP) Air Division, and on behalf of Nailite International, Inc. (Nailite), please find below (Part 1) the responses to the request for additional information regarding the above referenced permit application. Additionally, this letter includes a request to change select permit conditions and related comments, as discussed in Part 2 below.

PART 1

1. *Provide last 5 years of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emissions data. You may provide 5 years to date if 2004 data is available, if not, provide 1999 to 2003.*

   Please find attached as Table 1, tabulated VOC and HAPs emissions data representing year 1999 to August 2004. It is our understanding this information is to demonstrate Nailite's decreasing trend of air emissions as a result of installation of air pollution control equipment and implementation of work practice standards. Also attached, as Figure 1, is a graphical representation of the decreasing emissions trend for years 1999 through 2003. Figure 1 represents the sum of Line 1 (EU 01) and Line 2 (EU 04) emissions. Figure 2 represents emissions per emission unit for years 1999 through 2003. Emission estimates are based on a mass-balance approach, accounting for the capture and destruction efficiencies of the RTO. To be conservative, the calculations do not take into account the percentage of VOC/HAP that remains in the coating.

   Negligible amounts of xylene, ethylbenzene, and cumene are emitted, which are presented in Table 1. However, emissions of xylene, ethylbenzene, and cumene are not included in the chart presented in Figure 2.

The emissions data reflects greater than a 60 percent decrease in VOCs, HAPs, and toluene from 1999 through 2003.

2. *The Air Construction Revision Permit Application, dated June 15, 2004, requested that VOC emissions be limited by the PSD standard of 250 tons per year. In response to the request, the FDEP stated it will consider a 249 tons per year emissions limit; although, an emissions limit based on a shorter time duration will be established to enable the facility to demonstrate and evaluate their compliance status. The FDEP proposes a daily VOC emissions limit.*

   A daily emissions limit will be difficult for Nailite to comply with since Nailite's operations are strongly seasonal and coating use cannot be tracked on an hourly basis. Figure 3 presents Nailite's relative monthly VOC emissions for the years January 2001 through August 2004. As shown in the graph, emissions are not constant, but tend to generally increase in the spring/summer months and decrease in fall/winter correlating with customer demands and production rates. Nailite is concerned that a daily emission limit determined from the proposed annual emission limit of 249 tons per year divided by the allowable operation rate (based on 7,280 hours per year) will limit Nailite's production in their busy season and result in a loss of revenue.

   Nailite is aware that the FDEP's intention of establishing an emission limit based on a shorter averaging period is to evaluate compliance on a term that would facilitate determination of compliance status on a more immediate basis to allow for corrective action and reduce the potential of exceeding the annual limit.

   Nailite supports FDEPs objective and will consent to the emission limit of 249 tons VOC per year. Although, due to the seasonal fluctuations in operations, Nailite requests that the permitted emission limit be established as not to exceed 30 tons of VOC per month or 249 tons VOC per year.

3. *The EPA has promulgated the final regulations in 40CFR63 establishing Maximum Achievable Control Technology (MACT) standards for the Surface Coating of Plastic Parts Industry. Propose applicability and if applicable, a schedule of MACT compliance.*

   On April 19, 2004, the EPA published the final MACT Subpart PPPP for the Surface Coating of Plastic Parts Industry. According to Permit Condition No. 10 of the facility's existing Title V Operating Permit, once the final rule is adopted by the FDEP, Nailite may apply for a permit amendment to comply with any applicable less restrictive compliance requirement of the Federal MACT rather than the case-by-case MACT established for the facility. This however does not apply to the portion of Condition No. 10 which stipulates that the RTO control device already installed shall continue to be operated as required by the permit, since it is the basis for the PSD reclassification as a synthetic minor facility.

   As such, there are two options available as a result of the promulgation of the MACT; 1) retain the current case-by-case MACT and adopt the less restrictive Federal MACT compliance requirements or 2) adopt the Federal MACT, if more stringent.

   Based on the Federal MACT emission standard of 0.16 lb organic HAP emitted/lb coating solids used and requirements for notification,; performance testing; semi-annual compliance, monitoring, and startup, shutdown malfunction reports; development of a work practice plan and startup, shutdown, and malfunction plan; monitoring, and recordkeeping the Federal MACT appears to be more stringent than the case-by-case MACT determination already in place.

According to the MACT, existing affected sources must be in compliance with the final rule no later than April 19, 2007. New and reconstructed sources must be in compliance upon initial startup of the affected source or by April 19, 2004, whichever is later. According to the rule, an existing source is any affected source that is not a new source. A new source is any affected source, of which the construction or reconstruction is commenced after the Administrator first proposes a relevant MACT emission standard applicable to such source (December 4, 2002).

No. 1 Paint Line (EU 001) is considered an existing source since it has been in operation at since year 2000. The only improvements to EU 001 have been for pollution control purposes (i.e., installation of process enclosures and the RTO). To meet capture efficiency requirements, the facility improved the unit in accordance with the compliance plan, which is part of the facility's Title V Operating Permit. Since, the expense of the modifications were less than 50% of the cost of installing a brand new line, the line is not considered a reconstructed source. Therefore, EU 001 is considered an existing source and has until April 19, 2007, to comply with the final rule.

Additionally, No. 2 Paint Line (EU 004) is considered an existing source, since construction of the line commenced prior to the December 4, 2002, proposed rule promulgation date. Therefore, the MACT compliance date for EU 004 is also April 19, 2007. However, because the facility previously adopted a case-by-case MACT, the compliance date may be extended to April 19, 2011, if necessary and approved by the FDEP.

PART 2

1. According to the facility's Title V Operating Permit (0250407-006-AV) and the FDEP notice dated September 4, 2003, *Request to Re-Issue and Modify Construction Permit*, the hours of operation for each and every emission unit is limited to 7,280 hours per year. This condition limits the eight injection molding machines and eight hydraulic tanks (EU 002) and the four storage silos (EU 003) to 7,280 hours per year. As the hydraulic tanks and storage silos may contain their contents on a continuous basis, it is requested that this condition is revised to reflect 8,760 hours of operation for EU 002 and EU 003.

2. The capture efficiency of the No. 1 Paint Line (EU 001) was tested in March 2004. The results were previously provided to the FDEP. As discussed in the Revised Air Construction Permit application, submitted on June 15, 2004, the test yielded a lower than anticipated capture efficiency of 72.72%. This was not believed to be representative of the actual capture conditions for the paint line. It is thought that the natural gas fired oven associated with the paint line is oxidizing the flashed-off solvents prior to the entry of these solvents into the sample port. Based on a mass-balance evaluation, this condition appears as if higher flash-off is occurring resulting in fugitive emissions. Although, it is believed that destruction of the VOCs is actually occurring within the oven. Nailite requests that this destruction efficiency be accounted for in permitting and compliance efforts. Koogler and Associates has proposed a plan to estimate this efficiency. The proposed engineering plan is presented as Attachment A. Authorization to perform the test for FDEP's consideration in permitting and compliance efforts is requested. Once the authorized test is performed, results will be submitted to the FDEP.

3. In addition to the above request to increase the operating hours of the Injection Molding Machines/Oil Tanks (EU 002) from 7,280 to 8,760 hours, we are requesting that EU 002 be redesignated as an insignificant emission unit. The injection molding machines are closed units. The molding operations include the injection of a liquid, high viscous liquid colorant into the

pellet blend, plasticizing the blend, and molding to the desired form. According to the Material Safety Data Sheets (MSDSs), the colorant and polypropylene pellets do not contain VOCs or HAPs. Therefore, this unit is assumed to have negligible emissions and would qualify for the generic emission unit exemption in Rule 62-210.300(3)(b)1.b.(Florida Administrative Code (F.A.C.). Additionally, the oil tanks are integrated into the machines and serve to provide machine lubrication. It is our opinion that in addition to the generic emission unit exemption, the tanks also qualify for a categorical exemption under Petroleum Lubrication Systems, established in Rule 62-210.300(3)(a)30., F.A.C.

Additionally, the current operating permit does not accurately reflect existing equipment at the facility. The facility currently has nine injection molding machines and hydraulic tanks. Future modifications may include the construction of one additional injection molding machine and hydraulic tank.

4. In addition to the above request to increase the operating hours of the storage silos (EU 003) from 7,280 to 8,760 hours, we are requesting that EU 003 be redesignated as an insignificant emission unit. The silos are currently equipped with a vacuum pump/filter system to protect process equipment such as pipes from particulate buildup. The intent of the particulate control is not to control particulate matter from emitting into the atmosphere because the pellet system is a closed system with no points of emissions (with the exception of the baghouse, which is considered negligible). It is our opinion that this qualifies for the generic emission unit exemption in Rule 62-210.300(3)(b)1.b, F.A.C.

   Additionally, the current operating permit does not accurately reflect the facility's equipment. The facility currently has only two silos.

Please find enclosed the Professional Engineer (P.E.) Certification Statement and Responsible Official Certification. Should you have any questions regarding this letter, please contact the undersigned.

Sincerely,

GOLDER ASSOCIATES

Renee Weaver
Project Engineer

Scott McCann, P.E.
Associate

Attachments:

P.E. Certification Statement
R.O. Certification Statement
Table 1-Air Emissions
Figure 1-Total Air Emissions
Figure 2-Air Emissions per Emission Unit
Figure 3-Monthly VOC Emission Fluctuations
Attachment A-Engineering Plan

REW/SAM

H:\PROJECTS\2004proj\043-9535 Nailite Environmental Compliance\Response to RAI\Final\RAI Response.doc

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name :
   Mr. John Perry, Vice President of Operations

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Nailite International, Inc.**
   Street Address: **1111 NW 165th Street**
   City: **Miami** State: **Florida** Zip Code: **33169**

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(305) 620 - 6200 ext.241** Fax: **(305) 623 - 8227**

4. Owner/Authorized Representative Email Address: **jperry@nailite.com**

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

John Perry — Signature

10-19-04 — Date

AIREX CORPORATION

REGENERATIVE THERMAL OXIDIZER GENERAL DESCRIPTION

INTRODUCTION:

The Airex regenerative thermal oxidizer converts hydrocarbons as found in many industrial process streams into harmless carbon dioxide and water. It achieves this through the process of high temperature oxidation. The beds of heat exchange media provide up to 95% heat recovery to keep operating costs to a minimum.

EQUIPMENT:

The Airex oxidizer consists of two reinforced, insulated chambers filled with high temperature heat exchange media. The media filled beds are separated by a central combustion chamber that includes a burner to bring the process stream to its final oxidation temperature. Below each media bed is located an air plenum that directs the flow through the beds. As the flow enters the first bed, heat is transferred from the media to relatively cooler air. The air is heated to a temperature close to the combustion temperature and is directed into the combustion chamber where the burner heats it up the rest of the way. The air then exits the second bed where it releases heat back into the media. At controlled intervals the flow direction through the oxidizer is changed by the action of the two pneumatic poppet valves in order to maintain a stable temperature situation.

PROCESS COMBUSTION:

When the hydrocarbon laden process gas passes through the media bed and approaches the combustion chamber, its temperature rapidly increases. Due to the abundant oxygen content of the process gas, complete combustion readily occurs when the ignition point is reached in the combustion chamber, which is typically in the 1500°F to 1700°F range. With a sufficient concentration of solvents in the incoming process stream the heat energy of the solvent may be enough so that the destruction of hydrocarbons will be self-sustaining with no additional heat energy required from the burner.

5.6 **Basic Control Functions, Operations and Hardware:**

- Using the gas burner, the combustion chamber temperature during initial heat up is controlled by thermocouples TE-103 and TE-104 via their input to the PLC.
- After the temperature set points are reached the unit is put into "RUN". As supplemental fuel is required the natural gas injection will cycle on and off. Gas injection is controlled by thermocouples TE-103, TE-104, TE-108, and TE109 as inputs to the PLC.
- The PLC also includes high and low temperature limits for the oxidizers respective areas.
- The PLC operates the poppet valves, monitors chamber area temperatures and various permissive limits. The PLC along with the flame safeguard provides fault annunciation and logic control for all I/0 functions.
- The Main Control Panel includes the Quartech Operator Interface, (keypad/display), a mode selector switch, emergency stop, E-stop reset, fault reset, burner fault reset, various pilot lights which include a permissive fault indicator. Other control panel components are the burner management system, combustion air fan motor starter, and a modem for on line assistance.
- A door mounted alarm horn will notify operators of any faults. (Optional)
- Necessary over-load protection is provided in the form of a fused disconnect.

5.7 **Basic Oxidizer Operation:**

5.7.1 The beds are initially brought up to the desired temperature by the burner management system and the PLC utilizing a gas burner. Once the unit reaches "Run Mode", the bed's temperature is controlled by the PLC, switching the poppet valves and using the burner or the optional gas injection system too maintain the run mode temperature set points.

5.7.2 As solvents enter the bed, they are oxidized and heat is released. Depending on the concentration of solvents in the process air stream, supplemental fuel in the form of natural gas injection may be used. The PLC controls the natural gas injection so as to maintain bed temperatures of approximately 1500°F and a combustion chamber temperature average of 1700°F.

5.7.3 The ideal running condition is sufficient solvents to maintain bed temperatures as well as combustion chamber temperatures with no natural gas input.

If any thermocouple temperatures exceed the maximum operating temperature of (2000°F), the natural gas is turned "OFF" the process fan shuts down, and the fault is annunciated on the Quartech display interface.

5/5

JOB 2317-NAILITE INTERNATIONAL

SECTION 3

DESIGN DATA & PERFORMANCE TESTING

THE PERFORMANCE GUARANTEE IS BASED ON THE FOLLOWING PROCESS CONDITIONS:

3.0 Design Data	Measurement
• Maximum process air flow, SCFM	27,000
• Minimum process air flow, SCFM	9,000
• Maximum process temperature, °F	80
• Minimum process temperature, °F	80
• Maximum solvent concentration, #/Hr	366
• Minimum solvent concentration, #/Hr	123
• Maximum pressure at inlet of oxidizer, "w.c.	14
• Electrical power requirement for main control panel, CP-101 (380 VAC/3 phase/60 Hz), Amps	23
• Electrical power requirement for main process fan (460 VAC./3 phase/60 Hz), Amps	150
• Heat recovery efficiency, %	95
• Hydrocarbon destruction efficiency (to lower limit of 20 ppm of C[1]), %	98
• Compressed air requirements @ 90 psig, SCFH	280
• Natural gas requirement @ 5 psig, SCFH	7,150

1000 ppm /c
=
143 ppm

NOTE: *The compressed air requirement above is an hourly average based on one stroke of the inlet and outlet poppet valves at 4 minute intervals.*

EPA-R2-72-062
August 1972

PB 212 560

Afterburner Systems Study

R.W. Rolke, R.D. Hawthorne, C.R. Garbett,
E.R. Slater, T.T. Phillips, G.D. Towell

ENVIRONMENTAL PROTECTION AGENCY
Office of Air Programs
Contract EHS-D-71-3

SHELL DEVELOPMENT COMPANY
A DIVISION OF SHELL OIL COMPANY
Emeryville, California

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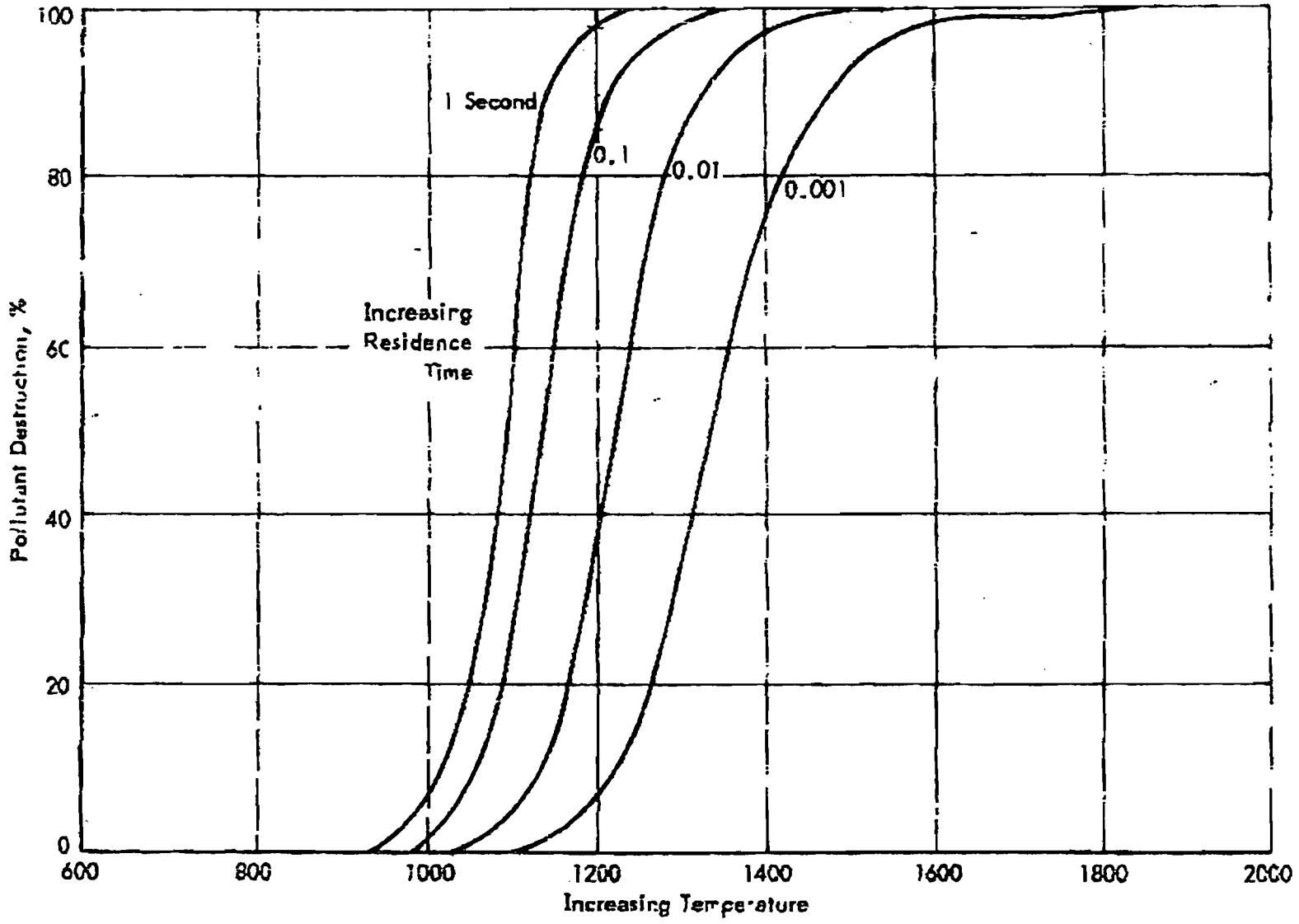


Figure 3-2a. COUPLED EFFECTS OF TEMPERATURE AND TIME ON RATE OF POLLUTANT OXIDATION

Table 1

Emissons Collection System Capture Efficiency Test

Nailite International, Inc. Miami, Florida Paint Line No. 1 VOC Release Data March 11, 2004				
	VOC Release (lb/hr) (1)			
Run No.	Booth 1	Booth 2	Overspray Recovery	VOC (2) Release
1	95.78	95.78	5.73	185.82
2	101.09	101.09	7.64	194.55
3	103.62	103.62	9.55	197.68
average>>	100.16	100.16	7.64	192.69

(1) Calculated from VOC content of paint and thinners used: see Appendix.

(2) As Toluene (see Appendix)

Emissons Collection System Capture Efficiency Test Nailite International, Inc. Miami, Florida							
Run No.	RTO Inlet Conditions			VOC Captured(4)			Capture Efficiency(7)
	Temp.	Moisture	Flow(3)	As Propane		As Toluene (5)	
	(F)	(%)	(scfm)	(ppm)	(lb/Hr)	(lb/Hr)	(%)
1	77	2.0	18966	1081	140.54	127.56	68.65
2	80	2.0	19953	1223	167.36	151.91	78.08
3	80	2.0	19960	1229	168.17	152.65	77.22
average>	79	2.0	19626	1178	158.69	144.04	74.65

(3) Standard cubic feet per minute, wet basis

(4) VOC maesured at RTO Inlet; expressed as propane

(5) lb/hr as Toluene = $\frac{\text{(lb/hr as Propane) x (MW toluene/toluene carbon number)}}{\text{(MW propane/propane carbon number)}} \times Rf_t$ (6)

(6) See Response Factor determination in Appendix = 7/6.91

(7) (VOC capture)/(VOC released); all VOC expressed as propane

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name :
   Mr. John Perry, Vice President of Operations

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: **Nailite International, Inc.**
   Street Address: **1111 NW 165th Street**
   City: **Miami** State: **Florida** Zip Code: **33169**

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: **(305) 620 - 6200 ext.241** Fax: **(305) 623 - 8227**

4. Owner/Authorized Representative Email Address: **jperry@nailite.com**

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

Signature

2/18/2005
Date

CRB
GEOLOGICAL & ENVIRONMENTAL SERVICES, INC.

June 15, 2004

Ms. Trina Vielhauer
Florida Department of Environmental Protection
Division of Air
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: CRB Project No. NAI 553-05; Nailite International, Inc., 1111 NW 165th Street, Miami, Florida; Permit No. 0250407-005-AC (PSD-FL-289A)

Dear Ms. Vielhauer:

Pursuant to our telephone conversation on June 11, 2004, please consider this document with attachments as a request to revise the above referenced permit, as discussed below. The purpose of this revision is to:

- establish final collection and destruction efficiency values for the Regenerative Thermal Oxidizer (RTO);
- modify emissions limitations for volatile organic compounds (VOCs); and,
- remove the operational deadline for Paint Line No. 1 (EU001)

Background

On August 28, 1998, Final Permit Number 0250504-001-AV was issued by DERM to the Nailite International, Inc. facility located at 1251 NW 165th Street, Miami, Florida 33169. This permit had a renewal application date of March 26, 2003 and an expiration date of August 27, 2003.

On September 26, 2000, Nailite applied for a construction permit in order to relocate the facility from 1251 NW 165th Street to 1111 NW 165th Street, Miami, Florida 33169. Pursuant to that application, Construction Permit No. 0250407-003-AC/PSD-FL-289 was issued. On February 21, 2002, Nailite applied to the Miami-Dade County Department of Environmental Resources Management (DERM) for a Title V Air Operation Permit Revision. The purpose of this permit revision was to incorporate the terms and conditions of Construction Permit No. 0250407-003-AC/PSD-FL-289 into the facility's current Title V Operating Permit.

The relocated facility included the No. 1 plastic panel spray line consisting of three spray booths, and eight injection-molding machines. The construction permit also authorized the installation of a Regenerative Thermal Oxidizer (RTO) and the No. 2 plastic panel

spray line consisting of three continuous spray booths and a curing oven. Captured emissions from the No. 1 Line (Emission Unit 001) and the No. 2 Line (Emission Unit 004) were required to be routed to the RTO.

Section A.5 of Nailite's Title V Permit required the shutdown and discontinuance of operation of Paint Line No. 1 by January 1, 2003. On December 31, 2002, Nailite received approval from the Florida Department of Environmental Protection (FDEP) to extend the use of this paint line through December 31, 2003 (Permit No. 0250407-005-AC). This extension was approved in order to perform additional capture and destruction efficiency testing and to allow for continuing engineering research into modified painting techniques based on the results of that testing.

On August 13, 2003, FDEP issued Title V Operation Permit No. 0250407-006-AV. The purpose of this permit was for the renewal of the existing Title V Operation Permit, as well as to incorporate the terms and conditions of Air Construction Permit No. 0250407-005-AC and to incorporate a compliance plan. The Compliance Plan outlined the additional construction measures and testing proposed by Nailite in order to improve the capture and destruction efficiency values for the RTO. The issuance of the Title V Operation Permit effectively extended the operational deadline for Paint Line No. 1 pending the construction of improvements and the completion of additional capture and destruction efficiency testing.

Capture and Destruction Efficiency Values

Construction and Testing Information

Pursuant to the Compliance Plan, Nailite undertook to construct extensive modifications to the Number 1 and Number 2 paint lines (EU001 and EU004) at a cost in excess of $400,000. These modifications consisted of the following:

- All open sections of the conveyors on Paint Lines No. 1 and No. 2 were enclosed to eliminate any "flashing-off" of emissions in exposed areas of the paint process lines.
- All new enclosed areas were exhausted to the RTO.
- Manned booths were added to Paint Lines No. 1 and No. 2 to capture emissions created during the hand spraying (highlighting) operation that was previously done in the open air without any capture.
- The radiant-heat oven associated with Paint Line No. 1 was replaced with a new gas oven that captures emissions and exhausts to the RTO.
- Old ductwork associated with Paint Line No. 1 was replaced with more efficiently designed ductwork.

Additional, minor changes were made to support the above improvements. Photographs of the paint lines following construction/modification are included as Attachment A.

Capture and destruction efficiency testing was performed by Koogler and Associates Environmental Services (Koogler) upon completion of the system modifications. Destruction efficiency of the RTO was measured at 99.18 percent. This value is well above the 95 percent destruction efficiency required in the current Title V Operation Permit No. 0250407-006-AV.

The capture efficiency test performed on Paint Line No. 2 indicated a capture efficiency of 91.4 percent. This efficiency represents an increase from the efficiency of 81.5 percent, which was measured on January 22, 2003, prior to the construction of system improvements.

The capture efficiency for Paint Line No. 1 averaged 72.72 percent during the recent testing event. Information from Nailite personnel indicates that this number is not representative of actual capture conditions for the paint line. It is the belief of Nailite engineering staff and the manufacturers of the gas oven associated with the paint line that the oven is oxidizing the flashed-off solvents prior to the entry of these solvents into the sample port. This conclusion is consistent with observations during testing that no odors were detected in the areas immediately surrounding the paint lines. On other separate site visits conducted by CRB personnel, the same observations were made during operation of Paint Line No. 1.

Information included in Attachment B describes the air flow processes in Paint Lines No. 1 and 2.

Proposed Permit Revision

Based upon the capture and destruction efficiency measured during the testing conducted between March 11 and 12, 2004, the following values are proposed for incorporation in the revised Air Construction permit:

- Paint Line No. 1 (EU001) – Measured capture efficiency = 70 percent with gas oven firing
- Paint Line No. 2 (EU002) – Capture efficiency = 90 percent
- RTO – Destruction efficiency = 95 percent

VOC Emissions Limitations

Nailite is currently operating under a permit condition that limits the VOC emissions by capping the quantity of VOCs included in the individual paints. However, it is requested that Nailite's VOC emissions be limited instead by the total annual emissions.

In order to comply with 62-296.570(4)(b)10, FAC, "Emissions of VOC from resin coating operation shall be limited by the use of low-VOC resin or thermal oxidation of emission from the purge cycle." Nailite currently utilizes low-VOC coatings almost exclusively, and both paint lines are connected to the Regenerative Thermal Oxidizer (RTO). As shown in the chart included in Attachment C, these modifications have resulted in a significant decrease in the overall emissions from the facility. Therefore, it is requested that Nailite's VOC emissions be limited only by the PSD standard of 250 tons per year. In addition, it is requested that the annual emissions fee be based upon actual emissions, calculated using the mass balance approach.

Continuation of Line 1

Nailite has undertaken extensive measures to comply with all regulatory guidelines with regard to the operation of the two (2) paint lines. The results of capture efficiency testing for

Paint Line No. 1 are not reflective of true conditions, and it is the belief of Nailite staff that the low capture efficiency measurement is an artifact of oxidation taking place within the gas-fired convection oven currently used on Paint Line No. 1. This was confirmed by representatives of the oven manufacturer and is consistent with other observations.

The utilization of Paint Line No. 1 does not cause a detrimental impact on the actual total emissions from the Nailite facility. This facility will continue to operate below the major facility threshold of 250 tons per year.

Summary

Through a number of emission controls, Nailite achieved a three-fold reduction in emissions from close to 450 tons per year to approximately 150 tons per year. Projected future emissions at a self-imposed operations cap of 7,280 hours per year would keep the facility well under the threshold of a major facility.

Based on the above, Nailite requests that permit 0250407-005-AC (PSD-FL-289A) be reissued with the following modifications:

1. Establish final capture and destruction efficiency values as indicated above.
2. Change the emissions limitation from 6 pounds of VOCs per gallon of paint to 250 tons per year of total emissions; annual Title V fee to be calculated using mass balance.
3. Allow EU001 to continue operation indefinitely.

Per your request, the first pages of Form No. 62-210.900(1) are included as Attachment D. If you have any questions or concerns, please don't hesitate to contact me at (305) 620-6200 ext. 222.

Very truly yours,
CRB Geological & Environmental Services, Inc.

Jennifer E.C. Porter, P.E.
Project Manager

Victor Rossinsky, Jr., P.G., Ph.D.
Senior Project Manager

cc: Ms. Mallika Muthiah, P.E., DERM

ATTACHMENT A

PHOTOGRAPHS

Paint Line No. 1 showing enclosed conveyors and new gas oven (enclosure with red controls).

Paint line No. 1 showing enclosed conveyors and ductwork that routes emissions to the RTO.

Paint line No. 1- loading end.

ATTACHMENT B

AIR FLOW PROCESSES

Nailite International, Inc.
1111 NW 165th Street
Miami, Florida

Oxidation of flashed-off solvents in Paint Line No. 1

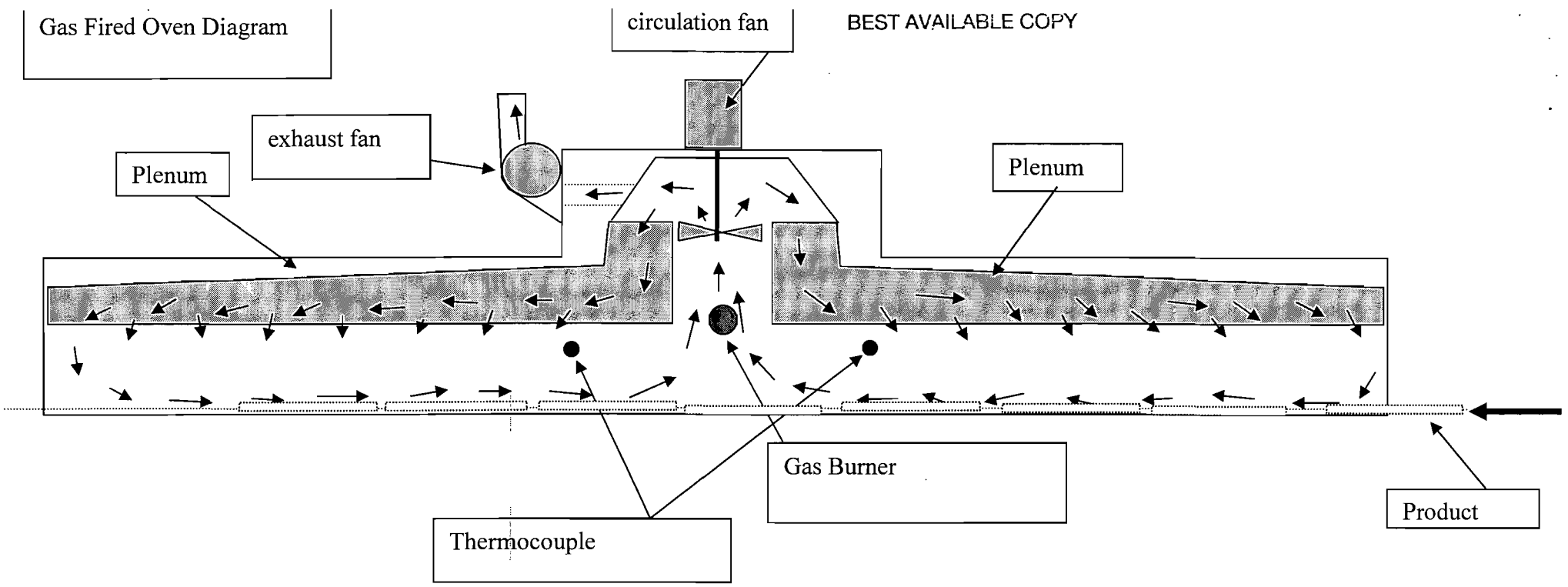
Paint Line No. 1 is equipped with a gas-fired convection oven that is utilized to cure the paint. Air is pulled into the oven and passes across the gas-fired burner, where it is heated to the temperature set point. This air is then forced onto the panels, aiding in the paint curing process. After the heated air is pushed onto the panels, the fan, located in the middle and top of the oven, pulls the majority of the air back into the oven, where it again passes over the burner.

Any solvent that flashed off of the panels during the heating process would be carried with the air back into the oven. As this solvent passes back over the burner, an oxidation reaction occurs, resulting in the production of carbon dioxide. During each cycle of air circulation, a portion of the return air is not recirculated; this air is sent to the regenerative thermal oxidizer (RTO).

The sample ports for capture efficiency testing are located in the ductwork. Therefore, any solvent that is recirculated with the heated air through the oven would not be measured. The small portion of air that is sent to the RTO would be measured during capture efficiency testing; therefore, the efficiency calculations would indicate a low capture since the majority of solvent-laden air is recirculated and oxidized within the oven.

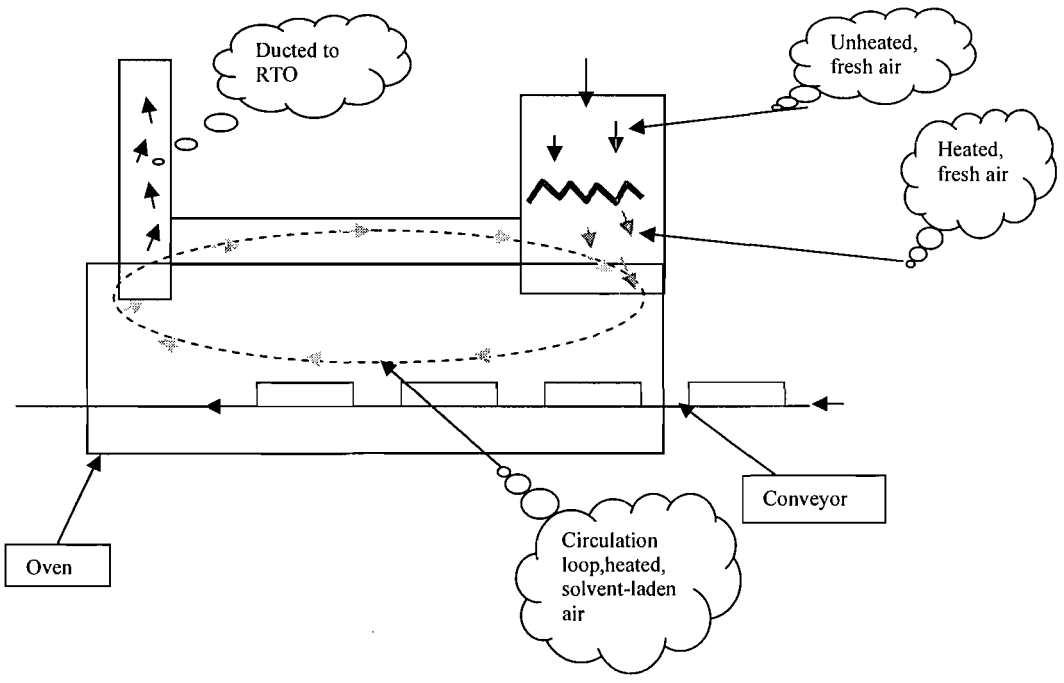
Paint Line No. 2 differs from Paint Line No. 1 in that "fresh", ambient air passes over the heating elements. This heated air is pushed onto the painted panels. The air is then circulated to the opposite end of the oven, where the majority of it enters the ductwork leading to the RTO. Therefore, the majority of flashed-off solvents would be sent to the RTO.

Gas Fired Oven Diagram



Note: The path of air circulation takes the solvent laden air across the burner before it goes through the circulation fan or the exhaust fan. At this point a large portion of the solvents in the air are being oxidized before they are sent to the regenerative thermal oxidizer.

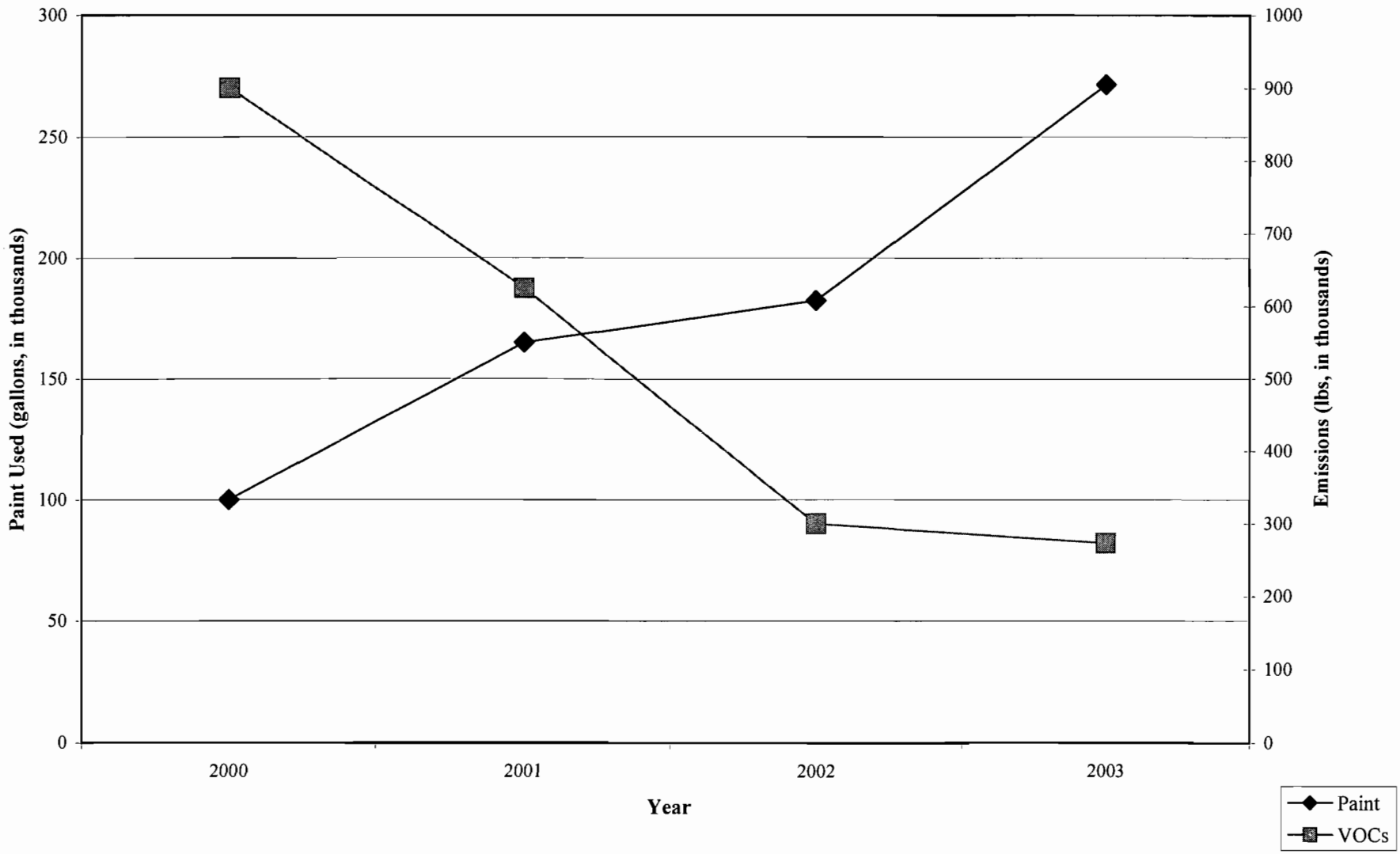
Oven-Paint Line 2
Conceptual



ATTACHMENT C

EMISSION CHART

Paint Usage and Emissions



ATTACHMENT D

FORM 62-210.900(1)

Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

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

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

Air Operation Permit – Use this form to apply for:

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

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

To ensure accuracy, please see form instructions.

Identification of Facility

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

Application Contact

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

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	6-22-04
2. Project Number(s):	0250407-008-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

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

Air Construction Permit

[X] Air construction permit. **REVISION**

Air Operation Permit

[ ] Initial Title V air operation permit.
[ ] Title V air operation permit revision.
[ ] Title V air operation permit renewal.
[ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
[ ] Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

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

[ ] Air construction permit and Title V permit revision, incorporating the proposed project.
[ ] Air construction permit and Title V permit renewal, incorporating the proposed project.

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

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

Application Comment

The purpose of this application is to obtain a REVISION to existing Air Construction Permit #0250407-005-AC. This revision will establish final collection and destruction efficiency values for the RTO, modify emissions limitations based upon 62-296.570, FAC, and continue operation of Emissions Unit 001.

This facility is a synthetic minor facility with regard to the PSD rules (will not exceed 250 tons per year).

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	No. 1 Line : Three (3) Binks Paint Spray Booths and an infrared curing oven	ACM1	N/A
004	No. 2 Line : Three (3) Continuous Spray Booths and an electric convection curing oven	ACM1	N/A

Application Processing Fee

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

Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name : John Perry, Vice President of Operations

2. Owner/Authorized Representative Mailing Address...
   Organization/Firm: Nailite International, Inc.
   Street Address: 1111 NW 165th Street
   City: Miami State: Florida Zip Code: 33169

3. Owner/Authorized Representative Telephone Numbers...
   Telephone: (305) 620 - 6200 ext. Fax: (305) 623 – 8227

4. Owner/Authorized Representative Email Address: jperry@nailite.com

5. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.

   John Perry
   Signature

   6-18-04
   Date

Application Responsible Official Certification

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

1. Application Responsible Official Name:

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

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

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

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

   ☐ The designated representative at an Acid Rain source.

3. Application Responsible Official Mailing Address...
   Organization/Firm:
   Street Address:
   City: State: Zip Code:

4. Application Responsible Official Telephone Numbers...
   Telephone: ( ) - ext. Fax: ( ) -

5. Application Responsible Official Email Address:

6. Application Responsible Official Certification:

   I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

   Signature Date

Professional Engineer Certification

1. Professional Engineer Name: Jennifer E.C. Porter
   Registration Number: 58144
2. Professional Engineer Mailing Address...
   Organization/Firm: CRB Geological & Environmental Services, Inc.
   Street Address: 4573 Ponce de Leon Boulevard
   City: Coral Gables State: Florida Zip Code: 33146
3. Professional Engineer Telephone Numbers...
   Telephone: (305) 447 - 9777 ext. 115 Fax: (305) 567 – 2853
4. Professional Engineer Email Address: jporter@crbgeo.net
5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here ☐, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

*(4) If the purpose of this application is to obtain an air construction permit **REVISION** (check here [X], if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here ☐, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here ☐, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature 15 June 2004
Date

(seal)

* Attach any exception to certification statement.

RECEIVED

FEB 18 2005

BUREAU OF AIR REGULATION

MIAMI DAILY BUSINESS REVIEW

Published Daily except Saturday, Sunday and
Legal Holidays
Miami, Miami-Dade County, Florida

STATE OF FLORIDA
COUNTY OF MIAMI-DADE:

Before the undersigned authority personally appeared O.V. FERBEYRE, who on oath says that he or she is the SUPERVISOR, Legal Notices of the Miami Daily Business Review f/k/a Miami Review, a daily (except Saturday, Sunday and Legal Holidays) newspaper, published at Miami in Miami-Dade County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT - NAILITE INTERNATIONAL, INC.

in the XXXX Court,
was published in said newspaper in the issues of

02/11/2005

Affiant further says that the said Miami Daily Business Review is a newspaper published at Miami in said Miami-Dade County, Florida and that the said newspaper has heretofore been continuously published in said Miami-Dade County, Florida, each day (except Saturday, Sunday and Legal Holidays) and has been entered as second class mail matter at the post office in Miami in said Miami-Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this

11 day of FEBRUARY A.D. 2005

(SEAL)

O.V. FERBEYRE personally known to me

Maria I. Mesa
My Commission DD293855
Expires March 04, 2008

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NAILITE INTERNATIONAL, INC. MIAMI-DADE COUNTY DEP FILE NO.: 0250407-008-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit Modification to Nailite International, Inc. for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new location. The final collection and destruction requirements for a previously issued case-by-case Maximum Achievable Control Technology (MACT) were determined for Line 2. The applicant location and mailing address is Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

Nailite manufactures molded plastic panels from polypropylene pellets and coats them in a series of paint booths. The previously issued permit specified the capture of volatile organic compounds (VOC) from the Line 2 and their destruction in a Regenerative Thermal Oxidizer (RTO). Relocation and operation of the previously uncontrolled Line 1 was temporarily authorized provided it was connected to the new RTO. The Department required improvements to vapor collection systems and efficiency testing for both lines prior to final authorization of the permanent operation of Line 1.

In late 2003 and early 2004, Nailite enclosed open areas in Lines 1 and Line 2 to capture the flashed off solvent, and convey the air/solvent mixture to the RTO. Nailite also conducted performance testing to determine the capture and destruction efficiencies of the collection and destruction system. This information was used to set final permit conditions for both lines including final emission requirements for the MACT determination conducted in 2000. The control requirements for the old Line 1 are 70 and 97 percent collection and destruction efficiency respectively. The case-by-case MACT requirements for the new Line 2 are 90 and 97 percent respectively.

This permit replaces an applicable VOC limit of 6 pound per gallon of paint with a 249 tons per year (TPY) limit on total VOC emissions from the facility. The annual limit in conjunction with the collection and control by the RTO system is much more restrictive because it represents much fewer emissions on a pounds per gallon basis.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Modified Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in the proceeding.

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.

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 indicated; (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 of the Florida Administrative Code.

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
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Miami-Dade County Department of
Environmental Resources Mgmt.
33 S.W. 2nd Avenue, Suite 900
Miami, Florida 33130-1540
Telephone: 305/372-6925
Fax: 305/372-6954

Dept. of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33416-5425
Telephone: 561/681-6600
Fax: 561/681-6755

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, South Permitting at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information.

2/11 05-4-35/521278M

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) N. Jacks | C. Date of Delivery 3/16/05

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7000 1670 0013 3110 2387

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark Here

7000 1670 0013 3110 2387

Se Mr. John Perry, VP Operation
St Nailite International, Inc.
1111 NW 165th Street
Ci Miami, Florida 33169

PS Form 3800, May 2000 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Howard Wasserman
President and CEO
Nailite International Inc.
1111 NW 165th St.
Miami, FL 33169-5819

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) [illegible] C. Date of Delivery 2/3/05

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 70002870 0000 7028 4045

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE
MIAMI FL 33169

Postage	$ $1.52
Certified Fee	$2.30
Return Receipt Fee (Endorsement Required)	$1.75
Restricted Delivery Fee (Endorsement Required)	$0.00
Total Postage & Fees	$ $5.57

Tallahassee FL Centerville Sta
Postmark Here
JAN 28 2005
01/28/2005
USPS 32308

Sent To
Mr. Howard Wasserman, Nailite Int.
Street, Apt. No.; or PO Box No.
1111 NW 165th St.
City, State, ZIP+4
Miami, FL 33169-5819

7000 2870 0000 7028 4045

PS Form 3800, May 2000 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John Perry
Vice President of Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, FL 33169

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) Ruth Diep | C. Date of Delivery 1/31/05

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7000 2879 0000 7028 4038

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE
MIAMI FL 33169

Postage	$ $1.52 $2.30
Certified Fee	$1.75
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ $5.57

Postmark Here
Tallahassee FL 02 Centerville Sta
JAN 28 2005
01/28/2005
USPS - 32308

Sent To
Mr. John Perry, Nailite International
Street, Apt. No.; or PO Box No.
1111 NW 165th St.
City, State, ZIP+4 Miami, FL 33169

7000 2870 0000 7028 4038

PS Form 3800, May 2000 See Reverse for Instructions