



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

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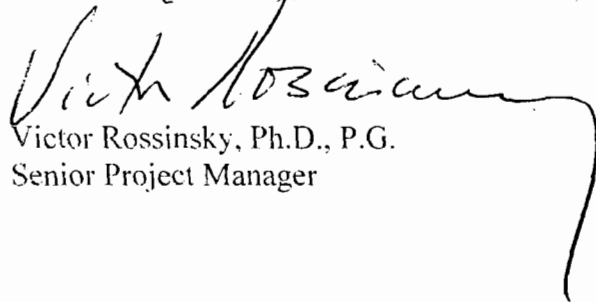
BUREAU OF AIR REGULATION

**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

Golder Associates Inc.

5100 West Lemon Street, Suite 114
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October 15, 2004

043-9535

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BUREAU OF AIR REGULATION

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 FDEP's 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 P 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.

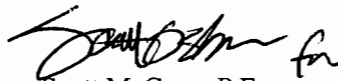
Please find enclosed the Professional Engineer (P.E.) Certification Statement and Responsible Official Certification. Should you have any questions regarding this letter, please contact the undersigned.

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

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Professional Engineer Certification

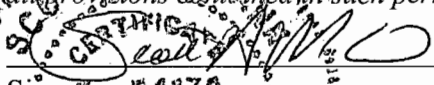
1. Professional Engineer Name: **Scott A. McCann, P.E.**
Registration Number: **54172**


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: 
Date: 10/14/04



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

Owner/Authorized Representative Statement

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

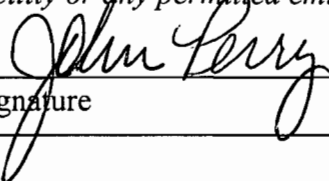
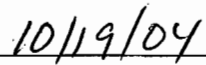
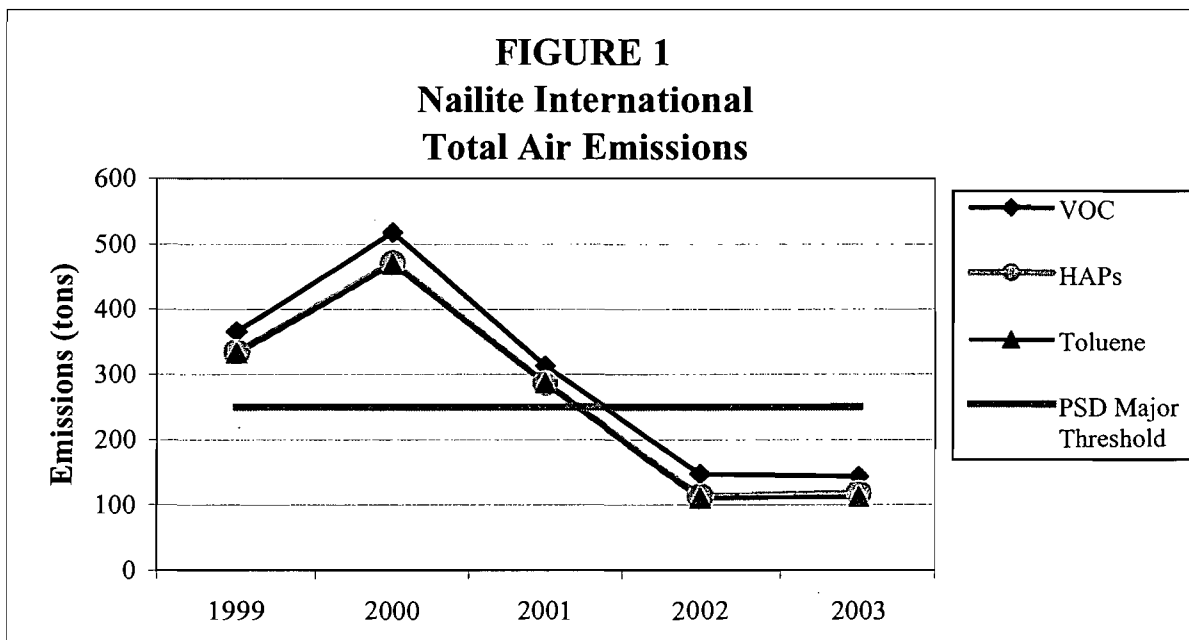
1. Owner/Authorized Representative Name : Mr. John Perry, Vice President of Operations
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Nailite International, Inc. Street Address: 1111 NW 165th Street City: Miami State: Florida Zip Code: 33169
3. Owner/Authorized Representative Telephone Numbers... Telephone: (305) 620 - 6200 ext.241 Fax: (305) 623 - 8227
4. Owner/Authorized Representative Email Address: <u>jperry@nailite.com</u>
5. Owner/Authorized Representative Statement: <i>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.</i>  Signature _____  Date _____

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
Emision 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	<i>0.59</i>	<i>4.17</i>	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*



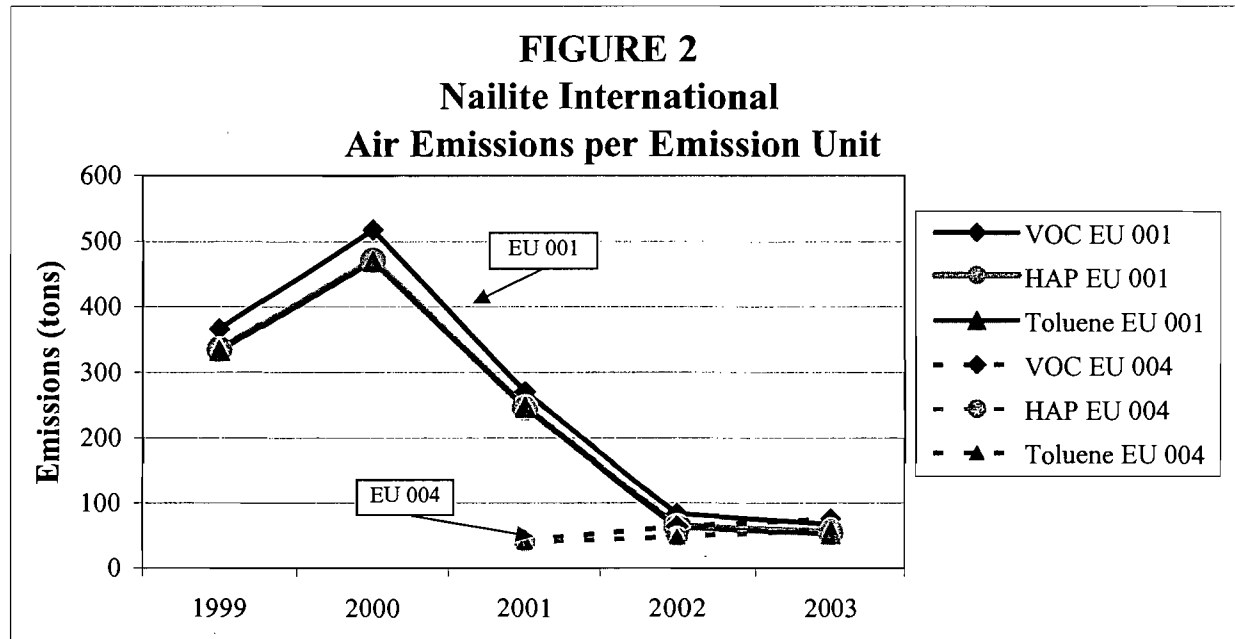
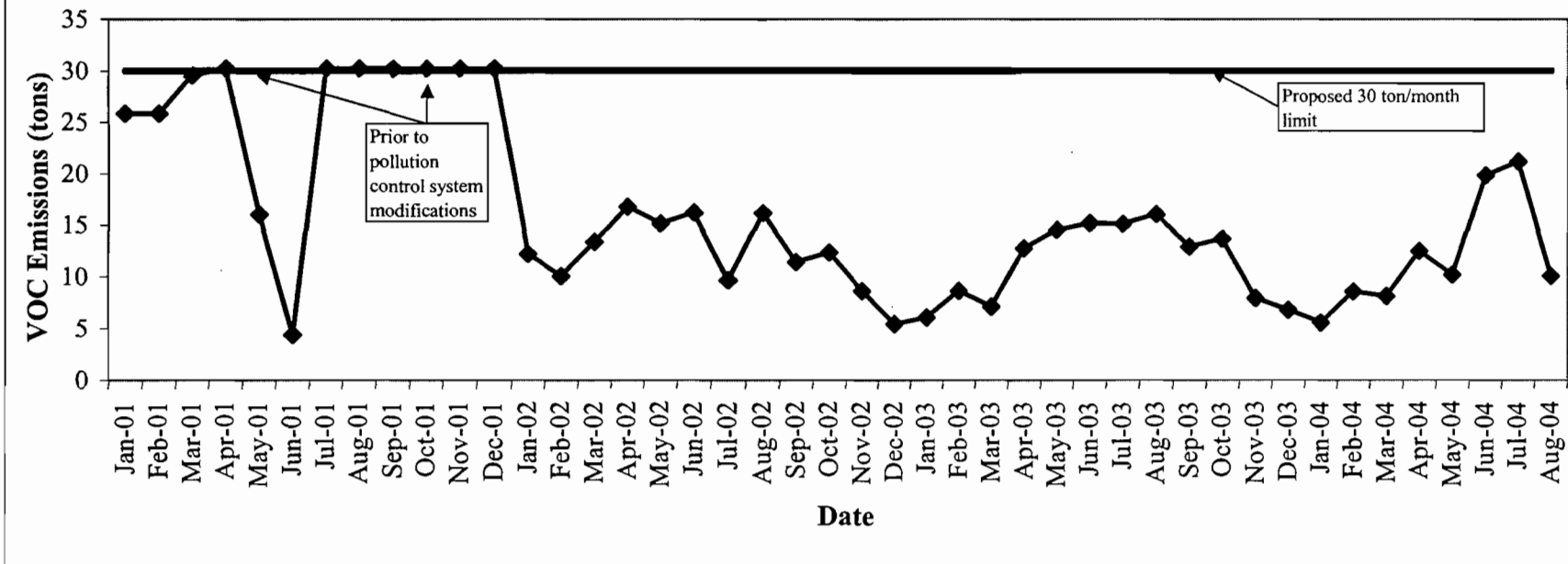


FIGURE 3
Nailite International
Monthly VOC Facility Emission Fluctuations



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 No. 1 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 CO₂ 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 CO₂ 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 CO₂ (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 CO₂ 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),
- CO₂ (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 CO₂ generated by the combustion of natural gas is expected to be approximately 160 pounds per hour; equivalent to a CO₂ 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),
- CO₂ (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 CO₂ concentration in Gas Stream C will increase. The CO₂ 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 CO₂ 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 CO₂ 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 CO₂ 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 is destroyed, the CO₂ 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.

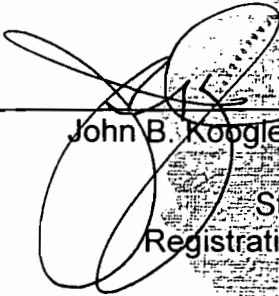
If solvent is destroyed in the drying oven of Paint Line No. 1, the CO₂ concentration in the gas stream leaving the oven (Gas Stream C) will increase by approximately 490 ppmv for each 10 percent of the applied coating solvent destroyed. An insignificant increase in CO/CO₂ in Gas Stream C will indicate 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 CO₂ 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

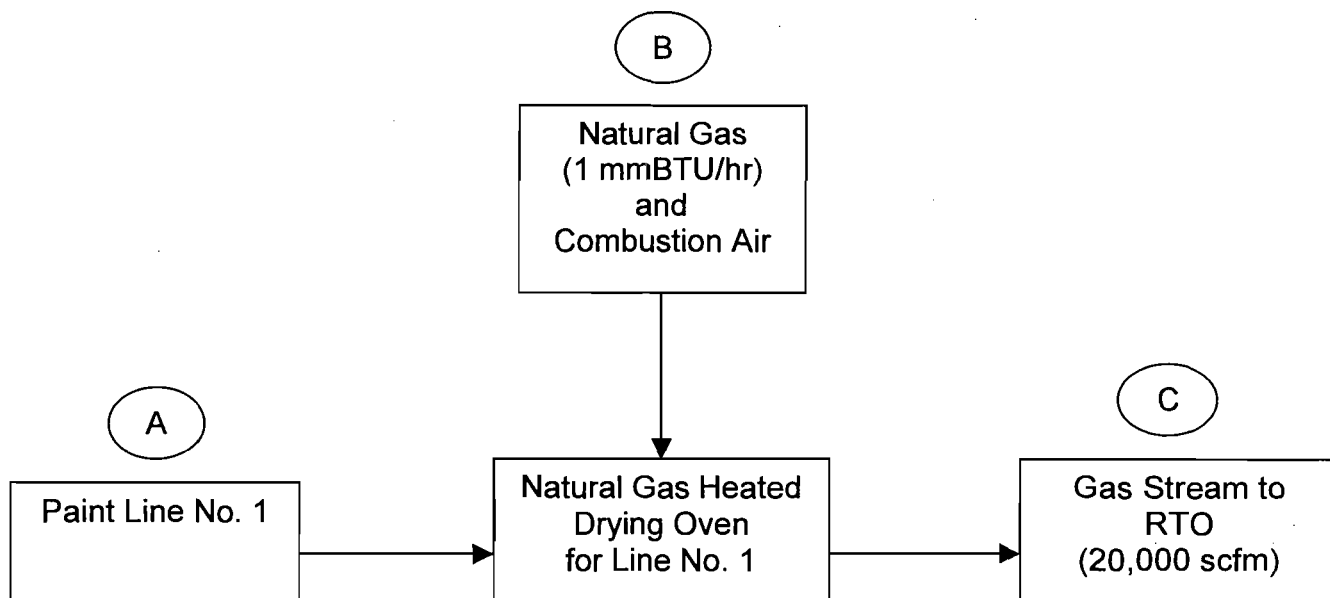
It is my professional opinion that the above protocol will permit an accurate determination of solvent (VOC) destruction in the natural gas fired drying oven of Paint Line No. 1 at Nailite. The sensitivity of the methods of measurement proposed herein coupled with previously measured system parameters 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 CO₂ 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)

Attachment No. 2

CO₂ from Dryer Burner Operation – Line No. 1

Burner at 1.0 mmBTU/hr fired with natural gas (assumed to be CH₄)

Gas consumption

$$= (10^6 \text{ BTU/hr}) / (1050 \text{ BTU/cu.ft.})$$

$$= 952 \text{ cu.ft./hr}$$

$$\times 1 / (385 \text{ cu.ft./lb-mole}) \times 16 \text{ lb/lb-mole}$$

$$= 39.6 \text{ lb CH}_4\text{/hr}$$

$$\times 12 / 16$$

$$= 29.7 \text{ lb C/hr}$$

CO₂ generated (assume complete combustion)

$$= 29.7 \text{ lb C/hr}$$

$$\times 44 / 12$$

$$= 161.3 \text{ lb CO}_2\text{/hr}$$

$$\times 1 / (44 \text{ lb/lb-mole}) \times 385 \text{ cu. ft. / lb-mole}$$

$$= 1412 \text{ cu.ft. CO}_2\text{/hr}$$

CO₂ concentration in 20,000 scfm Gas Stream C to RTO

$$= (1412 \text{ cu.ft. CO}_2\text{/hr}) / (20,000 \text{ cfm} \times 60 \text{ min/hr}) \times 10^6$$

$$= 1176 \text{ ppm (v/v)}$$

Attachment No. 3

CO₂ from Solvent (toluene) Combustion

VOC released in Line 1 during normal operations is about 200 lb/hr as toluene (C₇H₈)

CO₂ 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 CO₂/hr

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

= 586 cu.ft. CO₂/hr

CO₂ concentration in 20,000 scfm Gas Stream C to RTO

= (586 cu.ft. CO₂/hr) / (20,000 cfm x 60/min/hr) x 10⁶

= 488 ppm (v/v)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ 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. 	<p>A. Received by (Please Print Clearly) _____ B. Date of Delivery <u>9/6</u></p>
<p>1. Article Addressed to:</p> <p>Mr. John Perry V.P. of Operations Nailite International, Inc. 1111 NW 165th St. Miami, FL 33169</p>	<p>C. Signature <u>X [Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: _____</p>
	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

7001 0320 0001 3692 7997

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

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)	_____
Total Postage & Fees	\$ _____
<p>Sent To <u>John Perry</u></p> <p>Street, Apt. No., or PO Box No. <u>11 NW 165th St.</u></p> <p>City, State, ZIP+4 <u>Miami, FL 33169</u></p>	
PS Form 3800, January 2001	See Reverse for Instructions

7001 0320 0001 3692 7997

Postmark
Here

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> 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. 	A. Received by (Please Print Clearly) <i>H. Maier</i>	B. Date of Delivery <i>9-16-02</i>
1. Article Addressed to: Mr. John Perry Vice President of Operations Nailite International, Inc. 1111 NW 165th Street Miami, FL 33169	C. Signature <i>[Signature]</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
	D. Is delivery address different from item 1? If YES, enter delivery address below: <input type="checkbox"/> Yes <input type="checkbox"/> No	
2. <i>73</i> 7001 0320 0001 3692 7959	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952		

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)	
Total Postage & Fees	\$
Sent To John Perry Street, Apt. No., or PO Box No. 1111 NW 165th St. City, State, ZIP+4 Miami, FL 33169	
PS Form 3800, January 2001 See Reverse for Instructions	

7959 3692 0001 0320 7001

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

2. A

7001 0320 0001 3692 7362

COMPLETE THIS SECTION ON DELIVERY

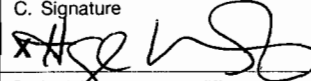
A. Received by (Please Print Clearly)

H. Marrero

B. Date of Delivery

12-16-02

C. Signature


 Agent Addressee

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

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

U.S. Postal Service**CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7001 0320 0001 3692 7362

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To

John Perry

Street, Apt. No.,

or PO Box No.

1111 NW 165th St.

City, State, ZIP+4

Miami, FL 33169

PS Form 3800, January 2001

See Reverse for Instructions

RECEIVED

DEC 17 2002

The Miami Herald

BUREAU OF AIR REGULATION

www.herald.com
www.elherald.com

PUBLISHED DAILY
MIAMI-DADE-FLORIDA

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

Before the undersigned authority personally
appeared:

JEANNETTE MARTINEZ

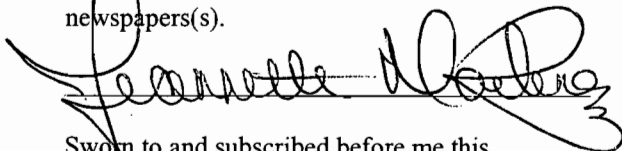
who on oath says that he/she is

CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at
Miami in Miami-Dade County, Florida; that the
attached copy of advertisement was published in said
newspaper in the issues of:

December 16, 2002

Affiant further says that the said The Miami Herald
is a newspaper published at Miami, in the said
Miami-Dade County, Florida and that the said
newspaper has heretofore been continuously published
in said Miami-Dade County, Florida each day 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 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
newspapers(s).

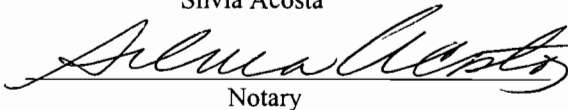


Sworn to and subscribed before me this
_16th day of _ December _, 2002

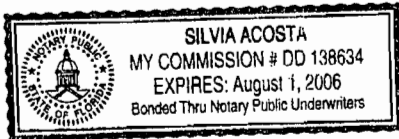
My Commission

Expires: _ August 1, 2006 _

Silvia Acosta



Notary



PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0250407-005-AC

Nailite International, Inc.
Miami-Dade County

The Department of Environment Protection (Department) gives notice of its intent to issue an air construction permit issued to Nailite International, Inc. revising certain conditions in the original construction permit issued to Nailite in September 2000. That permit (DEP File No. 0250407-003-AC, PSD-FL-289) provided for installation of a new panel spray coating line at 1111 NW 165th Street and relocation of an existing spray coating line from its former location at 1251 NW 165th Street to a new location at 1111 NW 165th Street, Miami, Dade County. The applicant's mailing address is: Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

The original construction permit considered the new line as a modification of an existing major facility since the two locations were considered adjacent and thus the same facility under the Department's Prevention of Significant Deterioration rules (Rule 62-212.400, F.A.C.) A Best Available Control Technology (BACT) determination was required in the original permit for emissions of volatile organic compounds (VOC) from the new line pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). A Maximum Achievable Control Technology (MACT) determination was required for hazardous air pollutants (HAPs) pursuant to Rule 62-204.800, F.A.C. and 40 CFR 63, National Emission Standards for Hazardous Air Pollutants (NESHAPS), Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(g) and 112(j).

This revision stems from the company's ongoing efforts to convert its processing technology from spray coating to non-spray pigment injection. Nailite currently manufactures and coats plastic shingles molded from polypropylene pellets. This process conversion is expected to significantly reduce long term emissions of VOC's currently permitted to be emitted. In connection with the conversion, the applicant has applied to the Department for revision of certain requirements in its existing air permits. The most important permitting change is an extension of the shutdown date for the old coating line (Emissions Unit 001) from December 31, 2002 to December 31, 2003, after which the old line will be permanently shut down. The additional year of operation of the old line will be carried out in such a manner that the total controlled emissions from the facility, including EU-001 and the new line (EU-004), will be substantially less than the major source threshold of 250 tons per year, making Nailite a "synthetic minor facility" under Department PSD rules. Also required by this permitting revision is additional emissions testing to establish emission limits that will apply permanently for the new line and for the CY 2003 operation of the old line. MACT applicability for the new line is unchanged from the original permit because the emissions of hazardous air pollutants (HAPs) exceed the threshold of 10 tons per year of a single HAP and 25 tons per year of total HAPs. Emissions of pollutants from the new line shall not exceed the following rates in tons per year: VOC/HAP, 130.5; NOx, 0.40; CO, 0.120; PM/PM10, 4.66; SO2, 0.00086.

An air quality impact analysis was conducted for the original permit. That analysis found that emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards or PSD increment.

The Department will issue a Revised BACT/MACT Determination along with the FINAL Permit, in accordance with the conditions of the DRAFT permit, 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 and request for public meetings concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. 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 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 this 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 purposed 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 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 Environ. Protection	Dade County Dept. of	Dept. of Environ. Protection
Bureau of Air Regulation	Environmental Resources Mgmt.	Southeast District
Suite 4, 111 S. Magnolia drive	33 S.W. 2 nd Avenue, Suite 900	400 North Congress Avenue
Tallahassee, FL 32301	Miami, FL 33130-1540	West Palm Beach, FL 33416-5425
Telephone: 850/488-0114	Telephone: 305/372-6925	Telephone: 561/681-6600
Fax: 850/922-6979	Fax: 305/372-6954	Fax: 561/681-6755

The complete project file includes the application, technical evaluations, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403-111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information. The DRAFT Permit and the Revised BACT/MACT Determination can be accessed on the internet at "<http://www.dep.state.fl.us/air/permitting/construct.htm>"

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:

John Perry
 V.P., Operations
 Nailite International, Inc.
 1111 NW 165th Street
 Miami, FL 33169

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

And Ortega *1-6-92*

C. Signature

X And Ortega Agent
 Addressee

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. 7001 0320 0001 3692 7287

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

OFFICIAL USE

7001 0320 0001 3692 7287

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

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

BEST AVAILABLE COPY

Golder Associates Fax

To: AL Liners

Fax Number: 850-922-6978

Company: DEP

Date:

From: Benny Susi

e-mail: @golder.com

Our ref:

Voice Mail:

RE:

Total pages (including cover): 2

Hard copy to follow

MESSAGE

RECEIVED
JAN 28 2002
BUREAU OF AIR REGULATION



Golder Associates

6241 NW 23rd St., Suite 500
Gainesville, FL 32653
U.S.A.
Telephone: (352) 336-5600
Fax: (352) 336-6603

**Comprehensive Consulting
Services in Geotechnical
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Remediation and Waste
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Risk Assessment

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Finland, Germany, Hong Kong,
Hungary, Indonesia, Italy, South
America, Sweden,
United Kingdom, United States

This document(s) included with this transmission are only for the recipient named above and contain privileged/confidential information. Unauthorized disclosure, dissemination, or copying of this transmission is strictly prohibited. If received in error, please destroy. Questions or problems with this transmission should be referred to the receptionist at the number provided above.

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5500
Fax (352) 336-6603



January 28, 2002

0037523

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

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

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


Dear Mr. Linero:

Golder Associates Inc. (Golder), on behalf of Nailite International is finalizing the operation permit application for the above-referenced facility and will be submitting the application within the next two weeks. Since the facility is a Title V source, it is our understanding from our discussion with DERM that additional review time will be required to allow DEP and EPA time to comment on the application submitted to DERM. As such, Golder is hereby requesting an extension of 6 months would be considered appropriate. This request has been discussed with Ms. Muthiah of DERM and Mr. Reynolds of DEP.

Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.


Benny Susi, P.E.
Associate

BS/jkw

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

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Golder Associates Inc.

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



January 28, 2002

RECEIVED 0037523

JAN 30 2002

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

BUREAU OF AIR REGULATION

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

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FDEP FILE NO. 0250407-003AC (PSD-FL-289)
EXTENSION REQUEST


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Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.


Benny Susi, P.E.
Associate

BS/jkw

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

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Reynolds, John

From: Susi, Benny [BSusi@GOLDER.com]
Sent: Wednesday, February 06, 2002 1:51 PM
To: Reynolds, John
Subject: Nailite Extension

John

Based on discussions with Malika at DERM and Nailite we are withdrawing the request for an extension. It has been decided to apply for an air operating permit at this time only for the new paint line and to concentrate on renewing the Title V operating permit next year when it expires.

Benny

Golder Associates Inc.

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



January 28, 2002

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

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

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

0037523
RECEIVED

JAN 30 2002

BUREAU OF AIR REGULATION

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Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

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

Benny Susi, P.E.
Associate

BS/jkw

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

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Golder Associates Inc.

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

RECEIVED

OCT 08 2001



BUREAU OF AIR REGULATION

October 3, 2001

0037523

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

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

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

Dear Mr. Linero:

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

Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

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

Benny Susi, P.E.
Associate

BS/jkw

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

P:\Projects\2000\0037\0037523A\12L100201.doc

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

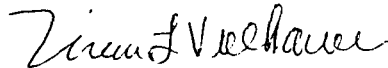
Mr. John Perry, VP Operations
Nailite International, Inc.
1111 NW 165th Street
Miami, Florida 33169

DEP File No. 0250407-005-AC
Permit No.: PSD-FL-289A
Dade County

Enclosed is the Final Air Construction Permit (0250407-005-AC) to install a new plastic panel spray line, relocate the existing panel spray line, and convert the existing line to a direct pigment injection process at the above facility located at 1111 NW 165th Street in Miami. This permit replaces the previously issued Air Construction Permit (0250407-003-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

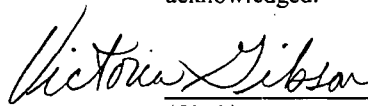
CERTIFICATE OF SERVICE

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 12/31/02 to the person(s) listed:

John Perry, NII*
Jim Little, EPA
Tom Tittle, DEP SED
Mallika Muthiah, Miami-Dade DERM
Victor Rossinsky, CRB

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.

 / December 31, 2002
(Clerk) (Date)

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Perry
 V.P., Operations
 Nailite International, Inc.
 1111 NW 165th Street
 Miami, FL 33169

2. 7001 0320 0001 3692 7287

PS Form 3811, July 1999

Domestic Return Receipt

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And Ortega 1-6-92

C. Signature

X And Ortega Agent Addressee

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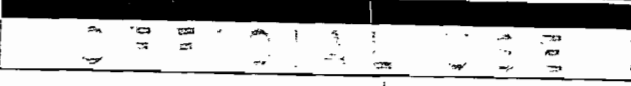
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 Street, Apt. No. or PO Box: 1111 NW 165th St.
 City, State, ZIP: Miami, FL 33169

PS Form 3811, January 2001

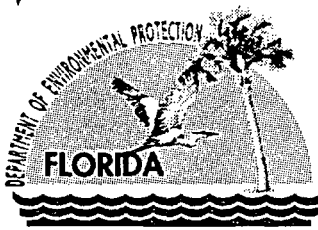
See Reverse for Instructions

FINAL DETERMINATION
NAILITE INTERNATIONAL, INC.
New Panel Spray Line
And Relocation of Existing Line
Permit No. 0250407-005-AC

An Intent to Issue a Revised Air Construction Permit to Nailite International, Inc. for the installation of a new panel spray line and the relocation of the existing line at the applicant's facility located at 1111 N.W. 165th Street, Miami, Dade County, Florida was distributed on December 12, 2002. The permit revises certain conditions in the original construction permit (0250407-003-AC/PSD-FL-289) issued on September 26, 2000. The original construction permit authorized the applicant 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. This revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules but leaves its Maximum Achievable Control Technology (MACT) applicability unchanged under the Department's National Emissions Standards for Hazardous Air Pollutants (NESHAP) rules. 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 also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be shut down permanently. 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.

The Public Notice of Intent to Issue Air Construction Permit was published in the Miami Herald on December 16, 2002. Copies of the draft construction permit and related documents were available for public inspection at the Department's offices in Tallahassee and West Palm Beach and at the Miami-Dade County Department of Environmental Resources Management (DERM) in Miami. No comments were received during the public comment period.

The final action of the Department will be to issue the permit as proposed.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

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

Permit No.: 0250407-005-AC
Project: New Panel Spray Line and
Relocation of Existing Line
Expires: December 31, 2003
Location: Miami-Dade County

AUTHORIZED REPRESENTATIVE:

Mr. John Perry, Vice President of Operations

PROJECT AND LOCATION

This permit revises certain conditions in the original construction permit (PSD-FL-289) issued on September 26, 2000 and incorporated into the existing Title V permit. The original construction permit authorized the applicant to construct a new plastics 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. This revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules but leaves its Maximum Achievable Control Technology (MACT) applicability unchanged under the Department's National Emissions Standards for Hazardous Air Pollutants (NESHAP) rules. 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 also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be permanently shut down. 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. 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 SIC code for this facility is 3089.

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.

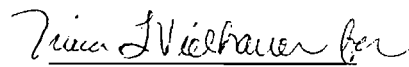
STATEMENT OF BASIS

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 BD Revised BACT/MACT Determination
Appendix GC General Permit Conditions


Howard L. Rhodes, Director
Division of Air Resources
Management

"More Protection, Less Process"

Printed on recycled paper.

**AIR CONSTRUCTION PERMIT
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 or EU-002) is located at 1111 NW 165th Street, approximately 500 feet east of the former facility. Under the former construction permit (PSD-FL-289 issued on September 26, 2000), Line No. 1 was relocated to the new address to be operated alongside the new Line No. 2. The No. 1 Line consists of three paint spray booths and eight injection-molding machines. The new No. 2 Line consists of three continuous spray booths and a curing oven. Air pollution controls consist of a state-of-the-art Regenerative Thermal Oxidizer (RTO) for controlling VOC/HAP emissions.

The facility consists of the following emissions units.

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

REGULATORY RECLASSIFICATION

The facility, consisting of the above emissions units, is reclassified as a synthetic minor facility regarding the Department's PSD rules because controlled emissions of volatile organic compounds (VOC) will not exceed 250 tons per year (TPY). This 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. However, because emissions of at least one hazardous air pollutant (HAP) exceed 10 tons per year and emissions of total HAPs exceed 25 tons per year, this facility is a major source of HAPs and thus is a major Title V HAP source.

REVIEWING AND PROCESS SCHEDULE

11-20-02	Date of Receipt of Application
11-20-02	Date Application Complete
12-16-02	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
- Revised Determinations of Best Available Control Technology (BACT) and Maximum Achievable Control Technology (MACT)
- Department's Intent to Issue

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Air Division of the Dade County Department of Environmental Resources Management (DERM), Suite 900, 33 Southwest Second Avenue, Miami, Florida 33130-1540 (phone number: 305/372-6925). All applications for permits to construct or modify an emission unit subject to Prevention of Significant Deterioration or Nonattainment (NA) Review requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).

2. General Conditions: The permittee is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]

3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Expiration: This air construction permit shall expire on December 31, 2003. 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, 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

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for and receive a Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's appropriate District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

GENERAL EMISSIONS LIMITING STANDARDS

9. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]

10. Unconfined Emissions of Particulate Matter: [Rules 62-296.320(4)(c) and 62-212.400, F.A.C.]

(a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

(b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.

(c) Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

(d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]

(a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

(b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. (Not federally enforceable)

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

[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.]

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

Excess emissions resulting from malfunction of any emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

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

19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]

21. Test Notification: The permittee shall notify the appropriate Department District Office and the appropriate local program at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]

22. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

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 Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the appropriate department District Office and the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

The following specific conditions apply to the following emissions units:

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

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

1. This permit supersedes the applicable conditions of the existing air operation permit for the facility. 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, Definitions-Potential to Emit (PTE) and 62-213.440(1)(b)1.b., F.A.C.]

2. The maximum amount of coating applied shall be 300,000 gallons per line per year. The No. 1 Spray Coating Line (EU-001) shall be allowed to operate through December 31, 2003, and not thereafter. EU-001 shall only operate while appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that its emissions are controlled along with those from Emissions Unit 004. Total hourly and annual emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the RTO shall be established within 45 days of receipt of the emission test results required in Specific Conditions Nos. 3 and 4 below. [Rules 62-4.070(3), 62-204.800(10)(d)2., and 62-210.200 (PTE), F.A.C., and MACT]

3. The air pollution control system shall consist of a Regenerative Thermal Oxidizer (RTO) as specified in the application and subsequent documents submitted in support thereof. The VOC/HAP capture and treatment system for EU-004 shall be designed to capture at least 95 percent of the total VOC/HAP emissions generated from the panel spraying operation while destroying at least 95 percent (90 percent overall capture and destruction). Appropriate emission limits and capture and destruction efficiencies for the air pollution control system shall be established by the Department within 45 days following receipt of the capture and destruction efficiency test results required by Specific Condition 4 below and shall be incorporated into the Title V permit for this facility. [Rule 62-4.070(3) F.A.C.]

4. Pursuant to the requirements of Specific Condition 3 above, the permittee shall demonstrate the RTO destruction efficiency while both EU-001 and EU-004 are operating simultaneously at permitted capacity. The individual VOC/HAP capture efficiencies of EU-001 and EU-004 shall be established by comparing raw VOC/HAP emissions generated during each of three separate one-hour test periods (based on material usage rates and appropriate emission factors) with captured emissions based on measured flow rates and VOC/HAP concentrations in the RTO inlet duct as determined by EPA Methods 2 and 18, 25 or 25A, described in 40 CFR 60 Appendix A. Depending on the test results, the Department may require a monitoring system for verifying that capture efficiencies are always maintained above a predetermined minimum level for reasonable assurance of adequate capture. A destruction efficiency test shall be performed annually on the RTO. Within 45 days following test completion, results of the above tests shall be submitted along with a complete test report to the Bureau of Air Regulation in Tallahassee, the Department's Southeast District and the Miami-Dade County Environmental Resources Management Department. [Rule 62-4.070(3) F.A.C.]

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

5. Testing of emissions shall be conducted annually with the emissions units operating at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emissions units may be tested at less than 90% of the maximum operating rate allowed by the permit; in this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the emissions unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C., 40 CFR 60 Appendix A and 40 CFR 60.8, Subpart A].

6. The permittee shall continuously keep and maintain a five-year ongoing compilation of the following records to demonstrate compliance with the VOC/HAP emissions limitations of Specific Condition No. 2 of this section. Records shall be completed no later than five working days after the end of each month.

- Amounts in pounds of each material used each month that contains VOC/HAP.
- Weight percentage of VOC/HAP in materials using the highest value listed on the Manufacturer's Safety Data Sheets.
- Amount in pounds of VOC/HAP emitted each month from each material used during the month, calculated by multiplying the amount of each material used by its VOC/HAP content and then by the appropriate emission factor.
- Total amount in pounds of VOC/HAP emitted each month, calculated as the sum of VOC/HAP emitted from each material used during the month as determined above.
- Rolling 12-month total amount in pounds and tons of VOC/HAP emitted in the most recent consecutive 12-month period, calculated as the sum of VOC/HAP emitted for the current month and the preceding eleven months.

[Rule 62-4.070(3), F.A.C.]

7. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

8. The above emissions units shall be subject to the following:

- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700, F.A.C.]
- Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700, F.A.C.]
- Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700, F.A.C.]
- In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700, F.A.C.]

9. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(5) to the Department's Southeast District Office and the Miami-Dade County Environmental Resources Management Department by March 1 of the following year for the previous year's operation. [Rule 62-210.370, F.A.C.]

AIR CONSTRUCTION PERMIT 0250407-005-AC
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

10. At such time as the U.S. EPA promulgates final regulations in 40CFR63 establishing MACT standards for the Surface Coating of Plastic Parts Industry pursuant to its December 4, 2002 proposed MACT regulations, and the Department adopts such standards into its rules, the permittee may apply for a permit amendment to comply with any applicable less restrictive compliance requirement of the promulgated MACT rather than the case-by-case MACT, except that the RTO control device already installed shall continue to be operated as required by this permit since it is the basis for the PSD reclassification as a synthetic minor facility. If such a requested amendment results in a modification, as defined by Department rules and the State Implementation Plan (S.I.P.), it shall be processed as a permit revision in accordance with the S.I.P. The new MACT, when adopted, shall be the BACT floor for PSD purposes in the event that the Department must reconsider the BACT provisions of this permit. [Rules 62-4.070(3), 62-212.400, F.A.C., MACT and BACT]

11. The facility shall adhere to the Revised BACT/MACT Determination. The Revised BACT/MACT Determination is attached as part of this permit following this page.

APPENDIX BD - REVISED DETERMINATIONS OF
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)
AND
MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT)

Nailite International, Inc.
Miami, Dade County

New Panel Line/Relocation of Existing Line
DEP File No. 0250407-005-AC

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

December 30, 2002

**Nailite International, Inc.
Miami, Dade County**

This revised BACT/MACT determination is related to the applicant's ongoing project to convert its processing technology from spray coating to non-spray pigment injection. This process conversion is expected to significantly reduce long-term emissions of toluene, a volatile organic compound (VOC) and a hazardous air pollutant (HAP), and other VOC/HAPs including xylene. In connection with the conversion, the applicant has applied to the Department for a revision of certain requirements in its existing air permit. The most important permitting change is an extension of the shutdown date for the old coating line (EU-001) from December 31, 2002 to December 31, 2003. The additional year of operation of the old line will be carried out in such a manner that the total controlled emissions from EU-001 and the new line (EU-002) will be less than the major source threshold of 250 tons per year, making Nailite a synthetic minor facility for PSD. Thus this revision removes BACT applicability for the new line while its MACT applicability remains unchanged since VOC/HAP emissions exceed the MACT threshold of 10 tons per year of any single HAP and 25 tons per year of total HAPs.

Since the new line was constructed as a BACT unit, some of the original permit requirements for the new line will be retained and emission limits will be set for the old and new lines based on actual test data as provided for in the former permit. The test-based emission limits will apply permanently for the new line while pollutant limits will be established for CY2003 operation of the old line. The Department will require that the old line be shut down permanently after December 31, 2003. MACT requirements for the new line are unchanged by this revision. Overall efficiency of capture and destruction for the new line (EU-004) will remain at 90 percent as in the original permit.

To provide further background for this revision, pertinent permitting actions are reviewed: On September 26, 2000, the Department issued Permit No. 0250407-003-AC (PSD-FL-289) to Nailite International, Inc. to construct a new plastic panel finishing spray line as a modification of its existing major facility formerly located at 1251 NW 165th Street in Miami, Dade County. The entire facility was being relocated to 1111 NW 165th Street, which is about 500 feet from Nailite's former location. The new spray line (EU-002) is housed in the new building along with the old line (EU-001), which was relocated to operate alongside the new line. Originally, the project was subject to review for Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) in accordance with Rule 62-212.400, F.A.C. The modification triggered PSD review for the new line because it resulted in a significant emissions increase of (VOC) with respect to Table 212.400-2, Florida Administrative Code (F.A.C.). The Department determined that the applicant's new line and the existing operation at the former location were "adjacent" according to the PSD rules and therefore comprised a single facility. Due to uncertainties in the capture efficiency of the old line, the Department did not have reasonable assurances initially that the controlled facility would come under the 250 tons per year threshold for PSD applicability, therefore, the PSD rules applied to the modification.

The project was also 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. since it is a major source of hazardous air pollutants (HAP). In the time that has elapsed since the original construction permit was issued, the U.S. Environmental Protection Agency (EPA) has still not issued final MACT standards for plastic parts coating processes. On December 4, 2002, MACT standards were proposed for new and existing sources engaged in surface coating of plastic parts and products (see Federal Register/Vol. 67, No. 233, December 4, 2002, pages 72276-72327). However, until final MACT rules are promulgated, the Department is required by its rules to issue a case-by-case MACT determination for major sources of HAP. Therefore, the

APPENDIX BD – REVISED BACT/MACT DETERMINATION

former MACT determination still applies for the new line and forms the basis for the permit limits pursuant to Specific Condition No. 3 in the revised construction permit (0250407-004-AC).

Other details of Nailite's operation and a description of the process were originally presented in the separate Technical Evaluation and Preliminary Determination issued concurrently with the original determinations. Therefore, this revised determination addresses mainly the new testing requirements for setting final emission limits.

FINAL PERMIT LIMITS

Nailite conducted its first compliance test in April of 2001 after starting operations at the new location in October 2000. Although the construction permit required a capture efficiency test on Line No. 1 (EU-001) within 45 days of startup in the new location, the April 2001 test involved capture and destruction efficiency tests for only the new line, EU-002. In response to Miami-Dade County's May 17, 2002 written notice of violation regarding the capture efficiency test on EU-001, Nailite conducted another series of tests in June 2002. Those tests, conducted by a different contractor, included a destruction test while operating both the old and new lines together and a separate capture efficiency test on the old line.

The Department discovered significant calculation errors in both the 2001 and 2002 sets of test results, which were obtained by different contractors using different analyzers and calibration gases. The data lacked the proper calibration gas conversions that would have been required to report actual toluene emissions; thus, the Department questioned the accuracy of the results. Due to additional discrepancies noted in the 2001 and 2002 material balance data used to calculate capture efficiencies, the Department determined that both the April 2001 and June 2002 test data are invalid. Consequently, Nailite agreed to retest both lines during January 2003 for the purpose of setting emission limits as outlined herein.

It was agreed that the retesting will be conducted according to the following protocols: EPA Method 25A using propane as the calibration gas will be employed to measure VOC/HAP emissions. For emissions of toluene (C₇H₈), the analyzer senses the seven carbon atoms of each toluene molecule as though they were 7/3 or 2.33 propane molecules. Therefore, the analyzer's ppm output will be adjusted to get the theoretical actual concentration in terms of toluene. After correcting the theoretical factor for the analyzer's individual sensitivity and response factors, the actual factor will be reported and used to calculate actual toluene emissions. The same procedure using the appropriate factors will be followed for other VOC/HAPs emitted. Three sets of three one-hour tests will be conducted: (1) simultaneous overall capture and destruction efficiency while both the old and new lines are operating together at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit; (2) individual capture efficiency of EU-001 operating alone at permitted capacity; and (3) individual capture efficiency of EU-002 operating alone at permitted capacity. The capture efficiency shall be determined from the monitored material consumption and the measured concentration at the inlet of the air pollution control device. Destruction efficiency shall be determined from the concentrations at the inlet and outlet of the air pollution control device.

MACT CONTROL TECHNOLOGY

VOC/HAP emissions consist primarily of toluene and xylene evolved during the coating process. The prior BACT/MACT determination established that VOC/HAP emissions will be controlled using a twin bed Regenerative Thermal Oxidizer (RTO) designed for a process gas flow rate of 27,000 acfm. Propane will be used at start-up as a secondary fuel, while the captured solvent will be the primary fuel.

APPENDIX BD – REVISED BACT/MACT DETERMINATION

VOC/HAP potential emissions from the new line are estimated at approximately 130.5 TPY. Approximately 90 percent of the VOC/HAP in the coating will be released in the paint booths while 10 percent remains in the coating. The design capture efficiency for the new line was originally set at 95 percent. The design destruction efficiency of the RTO was also set at 95 percent, although initial testing indicates that destruction efficiency will be above 99 percent. Therefore, until final testing is completed and limits established based on actual test results, the MACT overall capture and destruction efficiency requirement of 90 percent will remain unchanged.

Paint filters will be used to control particulate emissions from the spray booth operations. New circular ducting and a new filtering system will be installed to improve filtration and possibly the capture efficiency. PM/PM10 potential emissions are estimated at 4.7 TPY based on 25 percent over spray of coating in the booths and 95 percent removal by the paint filter pads.

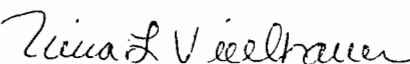
Emissions of SO₂, NO_x and CO are projected to be well below 1.0 TPY.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:


John Reynolds, Permit Engineer
New Source Review Section
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400
850/921-9530

Recommended By:

Approved By:

ajf


Trina Vielhauer, Chief
Bureau of Air Regulation



Howard L. Rhodes, Director
Division of Air Resources Management

12-31-02
Date:

12-31-02
Date:

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

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.
- The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

- 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 (); 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.

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THROUGH: ~~Adriano~~ Trina Vielhauer

FROM: John Reynolds *JR*

DATE: December 30, 2002

SUBJECT: Approval of Permit – New Panel Spray Line/Relocation of Existing Line
Construction Permit No. 0250407-005-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 also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be shut down permanently. 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.

No comments were received during the public comment period. It is recommended that the permit be issued at this time.

Attachments

RECEIVED

BEST AVAILABLE COPY

DEC 17 2002

The Miami Herald

BUREAU OF AIR REGULATION

www.herald.com
www.eiherald.com

PUBLISHED DAILY
MIAMI-DADE-FLORIDA

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

Before the undersigned authority personally
appeared:

JEANNETTE MARTINEZ

who on oath says that he/she is

CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at
Miami in Miami-Dade County, Florida; that the
attached copy of advertisement was published in said
newspaper in the issues of:

December 16, 2002

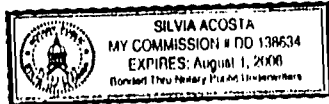
Affiant further says that the said The Miami Herald
is a newspaper published at Miami, in the said
Miami-Dade County, Florida and that the said
newspaper has heretofore been continuously published
in said Miami-Dade County, Florida each day and has
been entered as second class mail matter at the post
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 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(s).

Sworn to and subscribed before me this
16th day of December, 2002

My Commission

Expires: August 1, 2006
Silvia Acosta

Notary



PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0250407-005-AC

Nalite International, Inc.
Miami-Dade County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit issued to Nalite International, Inc. revoking certain conditions in the original construction permit issued to Nalite in September 2000. That permit (DEP File No. 0250407-003-AC, PSD-FL-289) provided for installation of a new panel spray coating line at 1111 NW 165th Street and relocation of an existing spray coating line from its former location at 1251 NW 165th Street to a new location at 1111 NW 165th Street, Miami, Dade County. The applicant's mailing address is: Nalite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

The original construction permit considered the new line as a modification of an existing major facility since the two locations were considered adjacent and thus the same facility under the Department's Prevention of Significant Deterioration rules (Rule 62-212.400, F.A.C.) A Best Available Control Technology (BACT) determination was required in the original permit for emissions of volatile organic compounds (VOC) from the new line pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21. Prevention of Significant Deterioration (PSD): A Maximum Achievable Control Technology (MACT) determination was required for hazardous air pollutants (HAPs) pursuant to Rule 62-204.800, F.A.C. and 40 CFR 63. National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(g) and 112(j).

The revision stems from the company's ongoing efforts to convert its processing technology from spray coating to non-spray solvent injection. Nalite currently manufactures and coats plastic shingles molded from polypropylene pellets. This process conversion is expected to significantly reduce long term emissions of VOC's currently permitted to be emitted. In connection with the conversion, the applicant has applied to the Department for revision of certain requirements in its existing air permit. The most important permitting change is an extension of the shutdown date for the old coating line (Emissions Unit 001) from December 31, 2002 to December 31, 2003, after which the old line will be permanently shut down. The additional year of operation of the old line will be carried out in such a manner that the total controlled emissions from the facility, including EU-001 and the new line (EU-004), will be substantially less than the major source threshold of 250 tons per year, making Nalite a "synthetic minor facility" under Department PSD rules. Also required by this permitting revision is additional emissions testing to establish emission limits that will apply permanently for the new line and for the CY 2003 operation of the old line. MACT applicability for the new line is unchanged from the original permit because the emissions of hazardous air pollutants (HAPs) exceed the threshold of 10 tons per year of a single HAP and 25 tons per year of total HAPs. Emissions of pollutants from the new line shall not exceed the following rates in tons per year: VOC/HAP, 130.5; NOx, 0.40; SO2, 0.120; PM10, 4.66; SO2, 0.00086.

An air quality impact analysis was conducted for the original permit. That analysis found that emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards or PSD increments.

The Department will issue a Revised BACT/MACT Determination along with the FINAL Permit, in accordance with the conditions of the DRAFT permit, 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 and request for public meetings concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2900 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 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 this 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 the 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 2B-109.205 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 2B-106.501 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 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 Environ. Protection Bureau of Air Regulation Suite 4, 1111 S. Magnolia Drive Tallahassee, FL 32301 Telephone: 850/489-0114 Fax: 850/922-6979	Dade County Dept. of Environmental Resources Mgmt. 33 S.W. 2 nd Avenue, Suite 900 Miami, FL 33135-1546 Telephone: 305/372-6825 Fax: 305/372-6854	Dept. of Environ. Protection Southeast District 400 North Congress Avenue West Palm Beach, FL 33416-6428 Telephone: 888/661-0600 Fax: 561/661-0765
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The complete project file includes the application, technical evaluations, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403-111, F.S. Interested persons may contact the Administrator, New Source Review Section at 1111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/489-0114 for additional information. The DRAFT Permit and the Revised BACT/MACT Determination can be accessed on the Internet at <http://www.dep.state.fl.us/air/permitting/construct.htm>



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 12, 2002

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. 0250407-005-AC
Construction Permit Revision - New Panel Line and Relocation of Existing Panel Line

Dear Mr. Perry:

Enclosed is one copy of the draft air construction permit revising certain conditions in Nailite's existing air permit for its facility at 1111 NW 165th Street, Miami, Dade County. The Revised BACT/MACT Determination, the Department's Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice of Intent to Issue Air Construction Permit 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, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact J. M. Reynolds at 850/921-9530.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

TV/JR
Enclosures

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

2. A 7003 0320 0003 3692 7362

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) H. Marrero E. Date of Delivery 12-16-02

C. Signature [Signature] Agent Addressee

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

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

4. Restricted Delivery? (Extra Fee) Yes

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7362 3692 0003 0320 7003



Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

See Reverse for Instructions
 Recipient Name: John Perry
 Street, Apt. No., or P.O. Box: 1111 NW 165th St.
 City, State, ZIP+4: Miami, FL 33169

In the Matter of an
Application for Permit by:

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

DEP File No. 0250407-005-AC
New Panel Spray Coating Line/Relocate Existing Line
Miami-Dade County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of draft permit attached) for the proposed project, detailed in the application specified above and the enclosed Revised BACT/MACT Determination, for the reasons stated below.

The applicant, Nailite International, Inc., applied on November 20, 2002, to the Department for an air construction permit revising certain conditions in its existing air permit for its facility located at 1111 NW 165th Street, Miami, Dade County.

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 is required to effect the changes requested, which include reclassification as a synthetic minor facility according to the Department's rules on Prevention of Significant Deterioration (PSD).

The Department intends to issue this air construction permit 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. 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 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 and requests for public meetings concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of Public Notice of Intent to Issue Air Permit. 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 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.

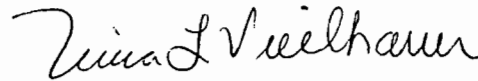
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal 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.



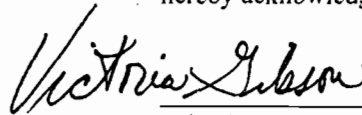
Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Revised BACT/MACT Determination, and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/13/02 to the person(s) listed:

John Perry*
Victor Rossinsky, CRB
Tom Tittle, SED
Mallika Muthiah, DCDERM
Gregg Worley, EPA
John Bunyak, NPS

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)

December 13, 2002

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0250407-005-AC

Nailite International, Inc.
Miami-Dade County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Nailite International, Inc. revising certain conditions in the original construction permit issued to Nailite in September 2000. That permit (DEP File No. 0250407-003-AC, PSD-FL-289) provided for installation of a new panel spray coating line at 1111 NW 165th Street and relocation of an existing spray coating line from its former location at 1251 NW 165th Street to a new location at 1111 NW 165th Street, Miami, Dade County. The applicant's mailing address is: Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

The original construction permit considered the new line as a modification of an existing major facility since the two locations were considered adjacent and thus the same facility under the Department's Prevention of Significant Deterioration rules (Rule 62-212.400, F.A.C.). A Best Available Control Technology (BACT) determination was required in the original permit for emissions of volatile organic compounds (VOC) from the new line pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). A Maximum Achievable Control Technology (MACT) determination was required for hazardous air pollutants (HAPs) pursuant to Rule 62-204.800, F.A.C. and 40 CFR 63, National Emission Standards for Hazardous Air Pollutants (NESHAPS), Subpart B, Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(g) and 112(j).

This revision stems from the company's ongoing efforts to convert its processing technology from spray coating to non-spray pigment injection. Nailite currently manufactures and coats plastic shingles molded from polypropylene pellets. This process conversion is expected to significantly reduce long term emissions of VOCs currently permitted to be emitted. In connection with the conversion, the applicant has applied to the Department for revision of certain requirements in its existing air permits. The most important permitting change is an extension of the shutdown date for the old coating line (Emissions Unit 001) from December 31, 2002 to December 31, 2003, after which the old line will be permanently shut down. The additional year of operation of the old line will be carried out in such a manner that the total controlled emissions from the facility, including EU-001 and the new line (EU-004), will be substantially less than the major source threshold of 250 tons per year, making Nailite a "synthetic minor facility" under Department PSD rules. Also required by this permitting revision is additional emissions testing to establish emission limits that will apply permanently for the new line and for the CY 2003 operation of the old line. MACT applicability for the new line is unchanged from the original permit because the emissions of hazardous air pollutants (HAPS) exceed the threshold of 10 tons per year of a single HAP and 25 tons per year of total HAPs. Emissions of pollutants from the new line shall not exceed the following rates in tons per year: VOC/HAP, 130.5; NOx, 0.40; CO, 0.120; PM/PM10, 4.66; SO2, 0.00086.

An air quality impact analysis was conducted for the original permit. That analysis found that emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards or PSD increment.

The Department will issue a Revised BACT/MACT Determination along with the FINAL Permit, in accordance with the conditions of the DRAFT permit, 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 and requests for public meetings concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. 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 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 this proceeding.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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 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:

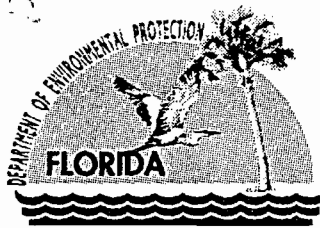
Dept. of Environ. Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, FL 32301
Telephone: 850/488-0114
Fax: 850/922-6979

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

Dept. of Environ. Protection
Southeast District
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, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information. The DRAFT Permit and the Revised BACT/MACT Determination can be accessed on the Internet at "<http://www.dep.state.fl.us/air/permitting/construct.htm>"

NOTICE TO BE PUBLISHED IN THE NEWSPAPER



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

DRAFT

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

Permit No.: 0250407-005-AC
Project: New Panel Spray Line and
Relocation of Existing Line
Expires: December 31, 2003
Location: Miami-Dade County

AUTHORIZED REPRESENTATIVE:

Mr. John Perry, Vice President of Operations

PROJECT AND LOCATION

This permit revises certain conditions in the original construction permit (PSD-FL-289) issued on September 26, 2000 and incorporated into the existing Title V permit. The original construction permit authorized the applicant to construct a new plastics 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. This revision reclassifies the facility to synthetic minor status regarding the Department's Prevention of Significant Deterioration (PSD) rules but leaves its Maximum Achievable Control Technology (MACT) applicability unchanged under the Department's National Emissions Standards for Hazardous Air Pollutants (NESHAP) rules. 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 also requires additional emissions testing of both lines so that emission limits can be established pursuant to the original permit. It also allows operation of the old No. 1 Line through December 31, 2003, after which it shall be permanently shut down. 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. 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 SIC code for this facility is 3089.

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 BD Revised BACT/MACT Determination
Appendix GC General Permit Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

"More Protection, Less Process"

Printed on recycled paper.

**AIR CONSTRUCTION PERMIT
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 or EU-002) is located at 1111 NW 165th Street, approximately 500 feet east of the former facility. Under the former construction permit (PSD-FL-289 issued on September 26, 2000), Line No. 1 was relocated to the new address to be operated alongside the new Line No. 2. The No. 1 Line consists of three paint spray booths and eight injection-molding machines. The new No. 2 Line consists of three continuous spray booths and a curing oven. Air pollution controls consist of a state-of-the-art Regenerative Thermal Oxidizer (RTO) for controlling VOC/HAP emissions.

The facility consists of the following emissions units.

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

REGULATORY RECLASSIFICATION

The facility, consisting of the above emissions units, is reclassified as a synthetic minor facility regarding the Department's PSD rules because controlled emissions of volatile organic compounds (VOC) will not exceed 250 tons per year (TPY). This 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. However, because emissions of at least one hazardous air pollutant (HAP) exceed 10 tons per year and emissions of total HAPs exceed 25 tons per year, this facility is a major source of HAPs and thus is a major Title V HAP source.

REVIEWING AND PROCESS SCHEDULE

11-20-02	Date of Receipt of Application
11-20-02	Date Application Complete
xx-xx-xx	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
- Revised Determinations of Best Available Control Technology (BACT) and Maximum Achievable Control Technology (MACT)
- Department's Intent to Issue

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

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

ADMINISTRATIVE

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Air Division of the Dade County Department of Environmental Resources Management (DERM), Suite 900, 33 Southwest Second Avenue, Miami, Florida 33130-1540 (phone number: 305/372-6925). All applications for permits to construct or modify an emission unit 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 permittee is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Expiration: This air construction permit shall expire on December 31, 2003. 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, 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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

operation permit is required for regular operation of the permitted emissions unit. The owner or operator shall apply for and receive a Title V operation permit prior to expiration of this permit. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's appropriate District office. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

GENERAL EMISSIONS LIMITING STANDARDS

9. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]

10. Unconfined Emissions of Particulate Matter: [Rules 62-296.320(4)(c) and 62-212.400, F.A.C.]

(a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

(b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.

(c) Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

(d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

11. General Pollutant Emission Limiting Standards: [Rule 62-296.320(1)(a)&(2), F.A.C.]

(a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

(b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. (Not federally enforceable)

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

[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.]

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

Excess emissions resulting from malfunction of any emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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

AIR CONSTRUCTION PERMIT
SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

16. Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

17. Calculation of Emission Rate: The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

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

19. Determination of Process Variables: [Rule 62-297.310(5), F.A.C.]

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

20. Required Stack Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. Sampling facilities shall also conform to the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]

21. Test Notification: The permittee shall notify the appropriate Department District Office and the appropriate local program at least 15 days prior to the date on which each formal compliance test is to begin. Notification shall include the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.]

22. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

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

REPORTING AND RECORD KEEPING REQUIREMENTS

23. Duration of Record Keeping: Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. [Rules 62-4.160(14)(a)&(b) and 62-213.440(1)(b)2.b., F.A.C.]

24. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]

25. Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the appropriate Department District Office and the appropriate local program within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the NESHAP requirements, excess emissions shall also be reported in accordance with 40 CFR 63, Subpart A. [Rule 62-4.130, F.A.C.]

26. Excess Emissions Report - Malfunctions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the appropriate Department District Office and the appropriate local program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report if requested by the Department. [Rule 62-210.700(6), F.A.C.]

27. Annual Operating Report for Air Pollutant Emitting Facility: The Annual Operating Report for Air Pollutant Emitting Facility shall be completed each year and shall be submitted to the appropriate department District Office and the appropriate local program by March 1 of the following year. [Rule 62-210.370(3), F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

The following specific conditions apply to the following emissions units:

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

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

1. This permit supersedes the applicable conditions of the existing air operation permit for the facility. 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, Definitions-Potential to Emit (PTE) and 62-213.440(1)(b)1.b., F.A.C.]

2. The maximum amount of coating applied shall be 300,000 gallons per line per year. The No. 1 Spray Coating Line (EU-001) shall be allowed to operate through December 31, 2003, and not thereafter. EU-001 shall only operate while appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that its emissions are controlled along with those from Emissions Unit 004. Total hourly and annual emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the RTO shall be established within 45 days of receipt of the emission test results required in Specific Conditions Nos. 3 and 4 below. [Rules 62-4.070(3), 62-204.800(10)(d)2., and 62-210.200 (PTE), F.A.C., and MACT]

3. The air pollution control system shall consist of a Regenerative Thermal Oxidizer (RTO) as specified in the application and subsequent documents submitted in support thereof. The VOC/HAP capture and treatment system for EU-004 shall be designed to capture at least 95 percent of the total VOC/HAP emissions generated from the panel spraying operation while destroying at least 95 percent (90 percent overall capture and destruction). Appropriate emission limits and capture and destruction efficiencies for the air pollution control system shall be established by the Department within 45 days following receipt of the capture and destruction efficiency test results required by Specific Condition 4 below and shall be incorporated into the Title V permit for this facility. [Rule 62-4.070(3) F.A.C.]

4. Pursuant to the requirements of Specific Condition 3 above, the permittee shall demonstrate the RTO destruction efficiency while both EU-001 and EU-004 are operating simultaneously at permitted capacity. The individual VOC/HAP capture efficiencies of EU-001 and EU-004 shall be established by comparing raw VOC/HAP emissions generated during each of three separate one-hour test periods (based on material usage rates and appropriate emission factors) with captured emissions based on measured flow rates and VOC/HAP concentrations in the RTO inlet duct as determined by EPA Methods 2 and 18, 25 or 25A, described in 40 CFR 60 Appendix A. Depending on the test results, the Department may require a monitoring system for verifying that capture efficiencies are always maintained above a predetermined minimum level for reasonable assurance of adequate capture. A destruction efficiency test shall be performed annually on the RTO. Within 45 days following test completion, results of the above tests shall be submitted along with a complete test report to the Bureau of Air Regulation in Tallahassee, the Department's Southeast District and the Miami-Dade County Environmental Resources Management Department. [Rule 62-4.070(3) F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

5. Testing of emissions shall be conducted annually with the emissions units operating at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emissions units may be tested at less than 90% of the maximum operating rate allowed by the permit; in this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the emissions unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C., 40 CFR 60 Appendix A and 40 CFR 60.8, Subpart A].

6. The permittee shall continuously keep and maintain a five-year ongoing compilation of the following records to demonstrate compliance with the VOC/HAP emissions limitations of Specific Condition No. 2 of this section. Records shall be completed no later than five working days after the end of each month.

- Amounts in pounds of each material used each month that contains VOC/HAP.
- Weight percentage of VOC/HAP in materials using the highest value listed on the Manufacturer's Safety Data Sheets.
- Amount in pounds of VOC/HAP emitted each month from each material used during the month, calculated by multiplying the amount of each material used by its VOC/HAP content and then by the appropriate emission factor.
- Total amount in pounds of VOC/HAP emitted each month, calculated as the sum of VOC/HAP emitted from each material used during the month as determined above.
- Rolling 12-month total amount in pounds and tons of VOC/HAP emitted in the most recent consecutive 12-month period, calculated as the sum of VOC/HAP emitted for the current month and the preceding eleven months.

[Rule 62-4.070(3), F.A.C.]

7. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

8. The above emissions units shall be subject to the following:

- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700, F.A.C.]
- Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700, F.A.C.]
- Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. [Rule 62-210.700, F.A.C.]
- In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700, F.A.C.]

9. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(5) to the Department's Southeast District Office and the Miami-Dade County Environmental Resources Management Department by March 1 of the following year for the previous year's operation. [Rule 62-210.370, F.A.C.]

AIR CONSTRUCTION PERMIT
SECTION III. EMISSIONS UNITS SPECIFIC CONDITIONS

10. At such time as the U.S. EPA promulgates final regulations in 40CFR63 establishing MACT standards for the Surface Coating of Plastic Parts Industry pursuant to its December 4, 2002 proposed MACT regulations, and the Department adopts such standards into its rules, the permittee may apply for a permit amendment to comply with any applicable less restrictive compliance requirement of the promulgated MACT rather than the case-by-case MACT, except that the RTO control device already installed shall continue to be operated as required by this permit since it is the basis for the PSD reclassification as a synthetic minor facility. If such a requested amendment results in a modification, as defined by Department rules and the State Implementation Plan (S.I.P.), it shall be processed as a permit revision in accordance with the S.I.P. The new MACT, when adopted, shall be the BACT floor for PSD purposes in the event that the Department must reconsider the BACT provisions of this permit. [Rules 62-4.070(3), 62-212.400, F.A.C., MACT and BACT]

11. The facility shall adhere to the Revised BACT/MACT Determination. The Revised BACT/MACT Determination is attached as part of this permit following this page.

(DRAFT)

APPENDIX BD - REVISED DETERMINATIONS OF
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)
AND
MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT)

**Nailite International, Inc.
Miami, Dade County**

**New Panel Line/Relocation of Existing Line
DEP File No. 0250407-005-AC**

**Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation**

December xx, 2002

APPENDIX BD – REVISED BACT/MACT DETERMINATION

Nailite International, Inc. Miami, Dade County

This revised BACT/MACT determination is related to the applicant's ongoing project to convert its processing technology from spray coating to non-spray pigment injection. This process conversion is expected to significantly reduce long-term emissions of toluene, a volatile organic compound (VOC) and a hazardous air pollutant (HAP), and other VOC/HAPs including xylene. In connection with the conversion, the applicant has applied to the Department for a revision of certain requirements in its existing air permit. The most important permitting change is an extension of the shutdown date for the old coating line (EU-001) from December 31, 2002 to December 31, 2003. The additional year of operation of the old line will be carried out in such a manner that the total controlled emissions from EU-001 and the new line (EU-002) will be less than the major source threshold of 250 tons per year, making Nailite a synthetic minor facility for PSD. Thus this revision removes BACT applicability for the new line while its MACT applicability remains unchanged since VOC/HAP emissions exceed the MACT threshold of 10 tons per year of any single HAP and 25 tons per year of total HAPs.

Since the new line was constructed as a BACT unit, some of the original permit requirements for the new line will be retained and emission limits will be set for the old and new lines based on actual test data as provided for in the former permit. The test-based emission limits will apply permanently for the new line while pollutant limits will be established for CY2003 operation of the old line. The Department will require that the old line be shut down permanently after December 31, 2003. MACT requirements for the new line are unchanged by this revision. Overall efficiency of capture and destruction for the new line (EU-004) will remain at 90 percent as in the original permit.

To provide further background for this revision, pertinent permitting actions are reviewed: On September 26, 2000, the Department issued Permit No. 0250407-003-AC (PSD-FL-289) to Nailite International, Inc. to construct a new plastic panel finishing spray line as a modification of its existing major facility formerly located at 1251 NW 165th Street in Miami, Dade County. The entire facility was being relocated to 1111 NW 165th Street, which is about 500 feet from Nailite's former location. The new spray line (EU-002) is housed in the new building along with the old line (EU-001), which was relocated to operate alongside the new line. Originally, the project was subject to review for Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) in accordance with Rule 62-212.400, F.A.C. The modification triggered PSD review for the new line because it resulted in a significant emissions increase of (VOC) with respect to Table 212.400-2, Florida Administrative Code (F.A.C.). The Department determined that the applicant's new line and the existing operation at the former location were "adjacent" according to the PSD rules and therefore comprised a single facility. Due to uncertainties in the capture efficiency of the old line, the Department did not have reasonable assurances initially that the controlled facility would come under the 250 tons per year threshold for PSD applicability, therefore, the PSD rules applied to the modification.

The project was also 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. since it is a major source of hazardous air pollutants (HAP). In the time that has elapsed since the original construction permit was issued, the U.S. Environmental Protection Agency (EPA) has still not issued final MACT standards for plastic parts coating processes. On December 4, 2002, MACT standards were proposed for new and existing sources engaged in surface coating of plastic parts and products (see Federal Register/Vol. 67, No. 233, December 4, 2002, pages 72276-72327). However, until final MACT rules are promulgated, the Department is required by its rules to issue a case-by-case MACT determination for major sources of HAP. Therefore, the

APPENDIX BD – REVISED BACT/MACT DETERMINATION

former MACT determination still applies for the new line and forms the basis for the permit limits pursuant to Specific Condition No. 3 in the revised construction permit (0250407-004-AC).

Other details of Nailite's operation and a description of the process were originally presented in the separate Technical Evaluation and Preliminary Determination issued concurrently with the original determinations. Therefore, this revised determination addresses mainly the new testing requirements for setting final emission limits.

FINAL PERMIT LIMITS

Nailite conducted its first compliance test in April of 2001 after starting operations at the new location in October 2000. Although the construction permit required a capture efficiency test on Line No. 1 (EU-001) within 45 days of startup in the new location, the April 2001 test involved capture and destruction efficiency tests for only the new line, EU-002. In response to Miami-Dade County's May 17, 2002 written notice of violation regarding the capture efficiency test on EU-001, Nailite conducted another series of tests in June 2002. Those tests, conducted by a different contractor, included a destruction test while operating both the old and new lines together and a separate capture efficiency test on the old line.

The Department discovered significant calculation errors in both the 2001 and 2002 sets of test results, which were obtained by different contractors using different analyzers and calibration gases. The data lacked the proper calibration gas conversions that would have been required to report actual toluene emissions; thus, the Department questioned the accuracy of the results. Due to additional discrepancies noted in the 2001 and 2002 material balance data used to calculate capture efficiencies, the Department determined that both the April 2001 and June 2002 test data are invalid. Consequently, Nailite agreed to retest both lines during January 2003 for the purpose of setting emission limits as outlined herein.

It was agreed that the retesting will be conducted according to the following protocols: EPA Method 25A using propane as the calibration gas will be employed to measure VOC/HAP emissions. For emissions of toluene (C₇H₈), the analyzer senses the seven carbon atoms of each toluene molecule as though they were 7/3 or 2.33 propane molecules. Therefore, the analyzer's ppm output will be adjusted to get the theoretical actual concentration in terms of toluene. After correcting the theoretical factor for the analyzer's individual sensitivity and response factors, the actual factor will be reported and used to calculate actual toluene emissions. The same procedure using the appropriate factors will be followed for other VOC/HAPs emitted. Three sets of three one-hour tests will be conducted: (1) simultaneous overall capture and destruction efficiency while both the old and new lines are operating together at permitted capacity, which is defined as 90-100% of the maximum operating rate allowed by the permit; (2) individual capture efficiency of EU-001 operating alone at permitted capacity; and (3) individual capture efficiency of EU-002 operating alone at permitted capacity. The capture efficiency shall be determined from the monitored material consumption and the measured concentration at the inlet of the air pollution control device. Destruction efficiency shall be determined from the concentrations at the inlet and outlet of the air pollution control device.

MACT CONTROL TECHNOLOGY

VOC/HAP emissions consist primarily of toluene and xylene evolved during the coating process. The prior BACT/MACT determination established that VOC/HAP emissions will be controlled using a twin bed Regenerative Thermal Oxidizer (RTO) designed for a process gas flow rate of 27,000 acfm. Propane will be used at start-up as a secondary fuel, while the captured solvent will be the primary fuel.

APPENDIX BD – REVISED BACT/MACT DETERMINATION

VOC/HAP potential emissions from the new line are estimated at approximately 130.5 TPY. Approximately 90 percent of the VOC/HAP in the coating will be released in the paint booths while 10 percent remains in the coating. The design capture efficiency for the new line was originally set at 95 percent. The design destruction efficiency of the RTO was also set at 95 percent, although initial testing indicates that destruction efficiency will be above 99 percent. Therefore, until final testing is completed and limits established based on actual test results, the MACT overall capture and destruction efficiency requirement of 90 percent will remain unchanged.

Paint filters will be used to control particulate emissions from the spray booth operations. New circular ducting and a new filtering system will be installed to improve filtration and possibly the capture efficiency. PM/PM10 potential emissions are estimated at 4.7 TPY based on 25 percent overspray of coating in the booths and 95 percent removal by the paint filter pads.

Emissions of SO₂, NO_x and CO are projected to be well below 1.0 TPY.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

John Reynolds, Permit Engineer
New Source Review Section
2600 Blair Stone Road, MS # 5505
Tallahassee, Florida 32399-2400
850/921-9530

Recommended By:

Approved By:

Trina Vielhauer, Chief
Bureau of Air Regulation

Howard L. Rhodes, Director
Division of Air Resources Management

Date:

Date:

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

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.
- The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

- 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 (); 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
Environmental Protection

Memorandum

TO: Trina Vielhauer

FROM: John Reynolds *JR*

DATE: December 12, 2002

SUBJECT: Draft Permit Revision for Nailite International, Inc. – Miami/Dade County
Permit No. 0250407-004-AC

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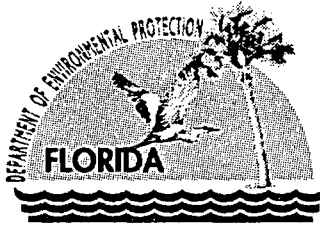
Attached for approval and signature is a draft permit that revises certain conditions in Nailite's existing air permit, most important of which a revision extending the permanent shutdown date of the old coating line from December 31, 2002, to December 31, 2003. The proposed revisions are related to Nailite's ongoing project to convert its processing technology from spray coating to non-spray pigment injection. This process conversion is expected to significantly reduce long-term emissions of toluene, a volatile organic compound (VOC) and a hazardous air pollutant (HAP), and other VOC/HAPs including xylene.

The additional year of operation of the old line will allow Nailite to concentrate its efforts on implementation of the new pigment injection technology rather than installing a new line that essentially perpetuates the former technology consisting of spray coating. If the new technology is successful to the extent expected, Nailite will meet its production goals with the operation of the new line only. If direct injection molding proves less successful than anticipated, Nailite will have to shut down the old line and replace it with another new line at the end of 2003. The additional year of operation of the old line will be carried out in such a manner that the total facility controlled emissions will be less than the major source threshold of 250 tons per year, making Nailite a synthetic minor facility for PSD. Thus this revision removes BACT applicability for the new line while its MACT applicability remains unchanged since VOC/HAP emissions exceed the MACT threshold of 10 tons per year of any single HAP and 25 tons per year of total HAPs.

Since the new line was constructed as a BACT unit, some of the original permit requirements for the new line will be retained and emission limits will be set for the old and new lines based on actual test data as provided for in the former permit. The test-based emission limits will apply permanently for the new line while pollutant limits will be established for CY2003 operation of the old line. MACT requirements for the new line are unchanged by this revision. Overall efficiency of capture and destruction for the new line (EU-004) will remain at 90 percent as in the original permit.

The new line is still 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. since it is a major source of hazardous air pollutants (HAP). On December 4, 2002, EPA proposed MACT standards for new and existing sources engaged in surface coating of plastic parts and products (see Federal Register/Vol. 67, No. 233, December 4, 2002, pages 72276-72327). However, until final MACT rules are promulgated, the Department is required by its rules to issue a case-by-case MACT determination for major sources of HAP. Therefore, the former MACT determination still applies for the new line and forms the basis for the permit limits pursuant to Specific Condition No. 3 in the revised construction permit (0250407-004-AC).

This revised permit is currently on Day 22.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

September 12, 2002

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. 0250407-003-AC (PSD-FL-289)
VOC Capture and Destruction Efficiency Tests

Dear Mr. Perry:

Nailite's response to the Department's August 29 letter requesting the EPA Method 25A emission calculations was received by fax on September 6. As detailed below, unexplained discrepancies in the reported data still exist preventing final resolution of permit limits and conditions.

The compliance tests that Nailite has conducted to date are: April 2001, Capture and Destruction – Line No. 2 (EU 004); June 2002, Capture – Line No. 1 (EU 001) and Destruction – Lines Nos. 1 and 2 running together (except for Run No. 3 during which Line No. 1 did not operate). The reported efficiencies for the 2001 tests were 87.3 percent capture and 99.3 percent destruction of toluene VOC. The 2002 reported efficiencies were 90.6 percent (revised) capture on Line No. 1 and 99.24 percent destruction on Line No. 2. The Department does not question the reported destruction efficiencies. However, several questions exist concerning the methods used for calculating RTO inlet quantities and capture efficiencies.

To properly calculate capture efficiency, the measured VOC inlet quantities and the VOC material usage must be expressed on the same basis; e.g., lbs/hr "as carbon" or "as toluene." The April 2001 test used methane as the calibration gas and the quantities were reported in lbs/hr "as methane," whereas the 2002 tests were reported in lbs/hr "as propane." Use of the different calibration gases is permissible as long as: (1) the Flame Ionization Analyzer (FIA) response factor for the specific organic compound is included in the calculation, and, (2) the inlet concentration is expressed in terms of the specific compound(s) that the material usage is based on.

Propane is the protocol calibration gas for EPA Method 25A since it provides a very stable mixture with diluent air or nitrogen such that the specified concentration will not change more than 2% over extended periods. The FIA instrument is calibrated to detect the carbon atoms in the exhaust gas as if they existed in the form of the calibration gas. For emissions of toluene (C₇H₈), the propane-calibrated analyzer senses the seven carbon atoms of each toluene molecule as though they were 7/3 or 2.33 propane molecules (C₃H₈). Therefore, the analyzer's ppm output, when calibrated using propane, must be multiplied by a factor of 3/7 or 0.428 to get the actual concentration in terms of toluene. Likewise, when methane is used for calibration, the concentration is multiplied by a factor of 1/7. These conversion factors must be further adjusted for the analyzer's individual response factors, determined from freshly prepared and known toluene samples, or obtained from the analyzer manufacturer's published values.

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The following illustrates how Nailite's test results are affected by these required conversions:

2001 Test – RTO Inlet on Line No. 2 - Methane Calibration (w/o FIA Response Correction)

Run No. 1: $7,583.2 \text{ ppm}(1/7)(92 \text{ lb/mole})(1/386.3)(E-06)(653,978 \text{ scf/hr}) = 168.7 \text{ lbs/hr "as toluene" vs. } 205.92 \text{ lbs/hr "as methane"}$

Run No. 2: $6,934.8 \text{ ppm}(1/7)(92 \text{ lb/mole})(1/386.3)(E-06)(653,978 \text{ scf/hr}) = 154.3 \text{ lbs/hr "as toluene" vs. } 188.31 \text{ lbs/hr "as methane"}$

Run No. 3: $7,824.5 \text{ ppm}(1/7)(92 \text{ lb/mole})(1/386.3)(E-06)(653,978 \text{ scf/hr}) = 174.1 \text{ lbs/hr "as toluene" vs. } 212.47 \text{ lbs/hr "as methane"}$

Average RTO Inlet: $165.7 \text{ lbs/hr "as toluene" vs. } 202.2 \text{ lbs/hr "as methane"}$

Average VOC Used: $(36.267 \text{ gal/hr} \times 8.92 \text{ lb/gal} \times 65.24\% \text{ wt.}) + (12.8 \text{ gal/hr} \times 7.23 \text{ lb/gal}) = 211.05 + 92.6 = 303.65 \text{ lbs/hr "as toluene"}$

Average Capture Efficiency (w/o FIA correction): $165.7/303.65 = 54.57\% \text{ vs. } 87.27\%$

2002 Test – RTO Inlet on Line No. 1 – Propane Calibration (w/o FIA Response Correction)

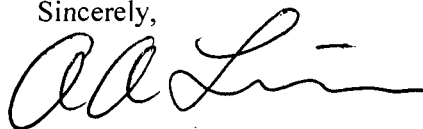
Average RTO Inlet: $2,106 \text{ ppm}(3/7)(92 \text{ lb/mole})(1/385)(E-06)(1,064,160 \text{ scf/hr}) = 229.52 \text{ lbs/hr "as toluene" vs. } 256.14 \text{ lbs/hr "as propane"}$

Average Capture Efficiency (w/o FIA correction): $229.52/282.81 = 81.16\% \text{ vs. } 90.6\%$

The next set of discrepancies concern the capture efficiencies that can be calculated from the material usages during the 2002 destruction efficiency tests. The combined-operation capture efficiencies for Lines Nos. 1 and 2 are 88.9% for Run No. 1 and 72% for Run No. 2. Run No. 3 showed a capture efficiency of only 61.4% for Line No. 2 (Line No. 1 was not running).

The Department is requesting that these discrepancies be clarified as soon as possible so that final limits and conditions can be established. If there are any questions regarding the above, please call John Reynolds at 850/921-9530.

Sincerely,



A. A. Linero, P.E. Administrator
New Source Review Section

AAL/JR

cc: Gregg Worley, EPA
John Bunyak, NPS
Tom Tittle, SED
Mallika Muthia, DCDERM
Victor Rossinsky, Jr., CRB

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<p>1. Article Addressed to:</p> <p>Mr. John Perry Vice President of Operations Nailite International, Inc. 1111 NW 165th Street Miami, FL 33169</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2 7001 0320 0001 3692 7959</p>	
<p>PS Form 3811, July 1999 Domestic Return Receipt 102555-00-M-3922</p>	

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PS Form 3800, January 2001	See Reverse for Instructions



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 29, 2002

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. 0250407-003-AC (PSD-FL-289)
VOC Capture and Destruction Efficiency Test

Dear Mr. Perry:

The Bureau of Air Regulation reviewed the referenced test report received on July 16 and found that the EPA Method 25A mass flow rate calculations aren't shown. This is necessary for a proper review, particularly since an error was discovered in the 2001 test report for the No. 2 line (EU 004). In that report, a volume percent VOC content was used instead of a weight percent, resulting in an erroneous capture efficiency determination. For your information, that calculation is shown below:

"Paint 36.267 gal/hr x 7.2346 lb/gal x 72.34 % VOC by volume = 189.802 lb/hr"

If the weight percent VOC was 65.24, as indicated in the most recent report, then the paint VOC mass would be 171.2 lb/hr and the capture efficiency would have been 93.4 percent rather than the reported figure of 87.27 percent.

With respect to Specific Condition No. 3 in the permit whereby the Department has 45 days following receipt of the test results to establish final emission limits, the test report will be considered incomplete until the calculations are received.

If there are any questions regarding the above, please call John Reynolds at 850/921-9530.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/JR

cc: Gregg Worley, EPA
John Bunyak, NPS
Tom Tittle, SED
Mallika Muthia, DCDERM
Victor Rossinsky, Jr., CRB

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1. Article Addressed to:

Mr. John Perry
 V.P. of Operations
 Nailite International, Inc.
 1111 NW 165th St.
 Miami, FL 33169

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 Street, Apt. No.,
 or PO Box **1111 NW 165th St.**
 City, State, ZIP+4
Miami, FL 33169

**CRB**

GEOLOGICAL & ENVIRONMENTAL SERVICES, INC.

November 15, 2002

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

Re: Nailite International, Inc. Permit No. 0250407-003-AC (PSD-FL-289)

Dear Mr. Linero:

Please consider this document with attachment as request to reissue the above referenced permit with modifications, discussed below. The fundamental change requested by Nailite is the extension of the shutdown requirement for EU-001 from December 31, 2002 to December 31 2003. The basis for this request is Nailite's continued efforts to reduce the volume of its VOC usage in the painting portion of its manufacturing process. Through continued improvements and innovations to its manufacturing process and the installation of state-of-the-art emissions control units, Nailite to date has reduced its VOC emissions from just under 900,000 pounds in the year 2000 to just under 290,000 pounds (last three months projected) in 2002 while production has increased significantly. These emissions were calculated using measured efficiencies for destruction and capture of 99.3 % and an average of 87 %, respectively. Nailite acknowledges that these efficiencies are not representative of actual efficiencies for reasons not yet established. Therefore, for purposes of calculating and projecting potential emissions in the future, to be used as basis and justification for Nailite's request for reissuance and modifications of permit No. 0250407-003-AC (PSD-FL-289), significantly more conservative numbers for destruction and capture efficiencies were utilized. These numbers clearly show that in no event will Nailite exceed the threshold for a major facility pursuant to Rule 62-212.400 of the Florida Administrative Code (F.A.C.). Nailite's engineering staff continues to employ state-of-the-art modifications to its painting process and will continue to do so through the end of 2003. As shown in this document, Nailite's past and future projected emissions reductions will result in having to use only one of the two existing paint lines by the end of 2003. It is critical to note that the planned December 31, 2002 shutdown of EU-001 would force Nailite into a position to discontinue its focus on emissions reduction and concentrate on construction efforts of a new paint line. A capital expenditure of this magnitude would and could not include future engineering efforts aimed at process and costly equipment modifications reducing the use of painting, in effect making the new paint line obsolete within one year of its purchase. It is for these reasons that allowing operation of EU-001 with continued efforts in reducing the use of VOCs until the end of 2003, at which time EU-001 will no longer be needed, is singularly the best option from an operational, business, and environmental standpoint.

Background

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

Nailite applied on February 21, 2002 to the DERM for a Title V Air Operation Permit Revision for the Nailite facility located at 1111 NW 165th Street, Miami, FL 33169. 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 construction permit was issued September 26, 2000 to relocate the facility from 1251 NW 165th Street to 1111 NW 165th Street, Miami, Miami-Dade County, Florida 33169.

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) are required to be routed to the RTO.

Emission Limitations and Standards Section A.5 of the Title V permit states that *"In order to operate Emissions Unit No. 001 beyond January 1, 2003, (18 months of operation at the new location) the VOC/HAP capture system shall be designed to capture at least 95% of the total VOC/HAP spraying emissions calculated from a material balance while destroying at least 95% of emissions captured in the Regenerative Thermal Oxidizer (RTO). The permittee shall provide supporting documents including test results, by January 1, 2003 in order to demonstrate compliance with the aforementioned efficiencies."*

Section A.5 (revised) further requires that the *"The permittee shall continuously keep and maintain a five-year ongoing compilation of the following records to demonstrate compliance with the VOC/HAP emission limitations."*

CRB Geological & Environmental Services, Inc. (CRB) was retained by Nailite in late 2001 to provide consulting services to calculate air emissions and assist in record keeping for compliance of PSD Air Construction Permit No. PSD-FL-289 and the Title V Operating Permit.

Pursuant to the PSD Permit, Section III, Emissions Units Specific Conditions, No. 6, Nailite is required to maintain monthly records of material usage and amount of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emitted. In addition, the Permit requires that a rolling twelve-month and five-year total of VOC and HAP emissions be maintained.

The scope of services includes the maintenance of a database for Nailite that tracks material usage and air emissions. The program operates as follows: within two working days after the end of each month the previous month's data is provided to CRB. CRB calculates the total monthly emission rates and compiles the twelve-month and five-year rolling total for each material containing or emitting VOCs and HAPs used at the permitted emission units. CRB provides Nailite with a printout of the tabulated data. This information is kept on-site at all times.

In addition, CRB tracks the SARA Title III Toxic Release Inventory (TRI) Chemicals. This tracking system facilitates Nailite in the determination of reporting eligibility and in accuracy of

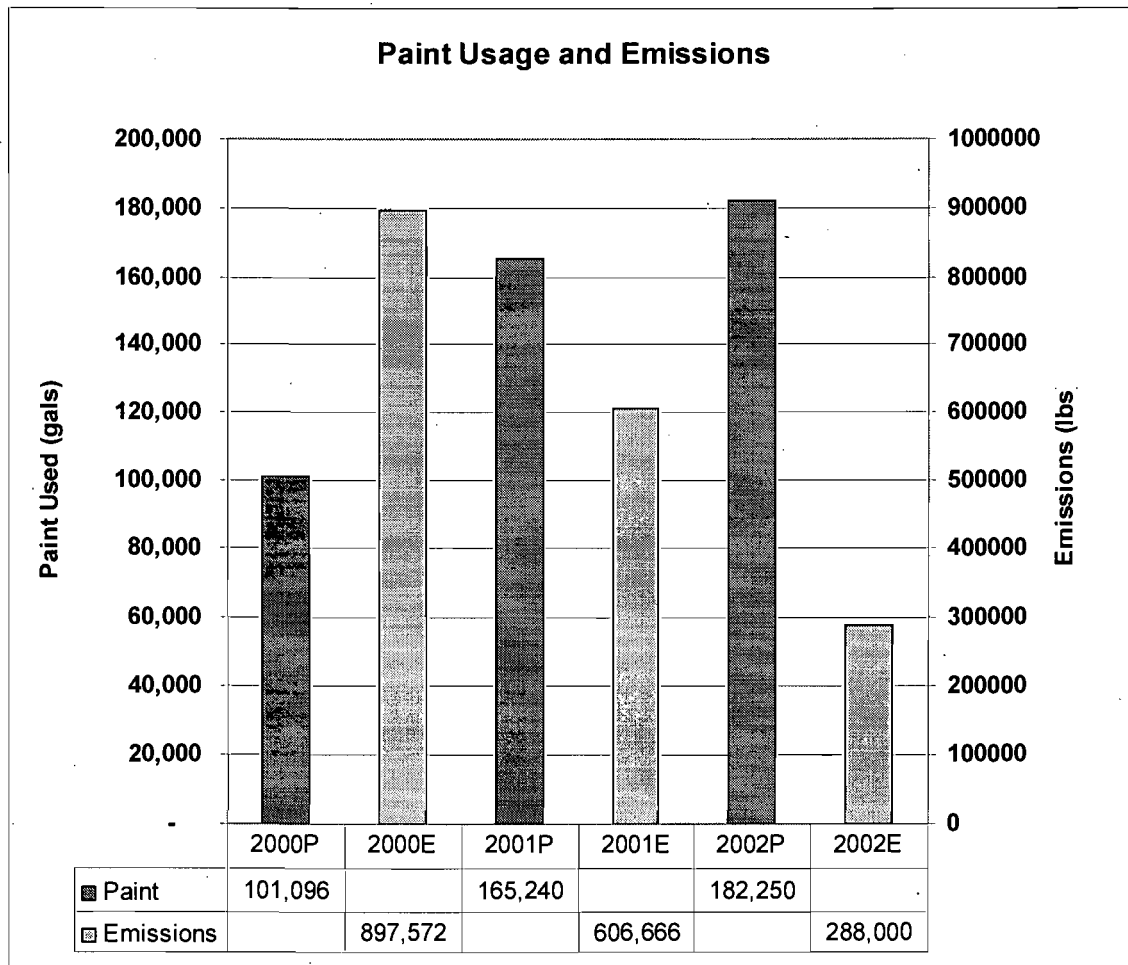
reporting. The system offers precise information relative to Nailite's continuing successes in the significant reduction of air emissions over the past three year period.

Nailite additionally provides a written report to the DERM, on a semi-annual basis that certifies the current compliance status with respect to the conditions of the Title V Permit. (March and September).

Emissions Reductions through 2002

Figure 1 displays Nailite's total emissions from 2000 to the present. Before 2000, Nailite's yearly emissions showed a dramatic increase from 476,300 pounds (238 tons) in 1998 to 628,450 pounds (314 tons) in 1999 to 897,000 pounds (449 tons) in the year 2000, when they peaked. The diagram in attachment A shows that as a result of several changes at Nailite, 2002 will exhibit the lowest emission rate (288,000 pounds or 144 tons) while usage rates will be at its highest.

Figure 1: Paint usage versus Emissions for years 2000 through 2002. Paint usage figures do not include VOCs which comprise approximately 45 % of combined paint and solvent usage.



The documented emissions reductions are the result primarily of Nailite's installation of a RTO system to which both lines have been hooked up. The old Paint Line (EU-001) was installed and

connected to the RTO in July 2001. The RTO was documented to be operating at 99.3 % destruction efficiency. Secondly, Nailite has implemented several engineering changes in the painting process which further reduced emissions. Among those changes are:

1. Fluid Line Improvements - regulator modifications and line re-configurations resulted in more even flow of paint through spray nozzles resulting in more evenly applied paint and consequent usage reduction. A 3 % reduction in paint usage was realized in EU-001.
2. Reciprocator Limit Switch - Installation of reciprocator switches in June 2002 improved control of paint spray duration as spray nozzles move over the panels reducing overspray and thus paint usage. A total reduction of 10 % paint/solvent usage was realized.
3. Higher Solids Paint - the implementation of higher solids paint initiated by Nailite in mid-2002 allows reduction in the use of solvents and thinners (VOCs). It is projected that over the course of 6 months, by the end of 2002, a reduction of over 17,000 gallons of solvent use will be realized. Further improvements and use of higher percent solids paints are planned for the year 2003. The conversion to high solids paints is projected to be 65 % complete by the end of 2002.

Nailite's Proposed Limitation of Operating Hours and Potential to Emit

Currently Nailite operates 16 hours per day and 6 days per week. This equals to a total of 4,992 hours per year. Nailite commits to not exceeding an average of operating 20 hours per day, 6 days per week, or 6,240 hours per year. The potential to emit with these restrictions is therefore 1.25 times greater than emissions levels in 2002.

In order to assure the FDEP that Nailite will not be a Major Facility by keeping emissions below 250 tons/year, the following conservative assumptions were made. The basis or starting point for calculating the potential to emit was taken from Nailite's usage rates in 2002, which amounted to a total of 2,042,778 pounds or 1,021 tons of paint/solvents. In addition to other conservative assumptions listed later, this approach has an inherent safety factor in that further reductions in solvent use such as continued increases in higher solids paint use and the introduction of paintless product are not taken into account. Thus, the future potential to emit for Nailite is based on 2,042,778 pounds times 1.25, which is 2,553,473 pounds or 1,277 tons of paint/solvent usage. This usage will continue to comply with the permitted limit of 300,000 gallons of paint/solvent usage per line per year. Based on information related to formulations currently used at Nailite, at the self-imposed limit of 6,240 hours per year operating level, Nailite will utilize no more than a total of 415,000 gallons of paint / solvent. As discussed above, this usage rate taken as the basis for calculating Nailite's potential to emit is significantly higher than the actual anticipated usage because it does not incorporate reductions in solvent use in Nailite's painting operations. These reductions will be discussed further below, under a separate heading.

Table 1 below lists the maximum possible usage in 2003 based on usage documented during 2002 with October, November, and December representing a year to date average for January through September of 2002. Destruction of 99 % and capture efficiencies of 70 % and 95 % for EU-001 and EU-004, respectively were used. As EU-004 is subject to BACT determination, its capture efficiency of 95% was assumed. Table 1 shows that even under rather conservative estimates for EU-001 capture, Nailite will not be a Major Facility. As mentioned earlier, the projected VOC usage does not contemplate reduction in 2003 due to full implementation of high solids paints and conversion of some of Nailite's product to a paintless process. Reductions of solvent use due to these changes in 2003 are discussed at a later point and will result in lower emissions than indicated in Table 1.

Table 1: Projection of 2003 emissions assuming 99 % destruction efficiency

	Projected Usage of VOCs in 2003			Projected Emissions 2003	
	Maximum VOC Usage at 6240 hrs/year (lbs)	EU-001 (50 %)	EU-004 (50%)	Capture Efficiency of EU-001 at 70% (lbs)	Capture Efficiency of EU-004 at 95% (lbs)
January	179,653	89,826	89,826	27,577	5,345
February	148,334	74,167	74,167	22,769	4,413
March	197,202	98,601	98,601	30,271	5,867
April	247,451	123,725	123,725	37,984	7,362
May	223,645	111,822	111,822	34,329	6,653
June	239,299	119,650	119,650	36,732	7,119
July	176,126	88,063	88,063	27,035	5,240
August	295,105	147,553	147,553	45,299	8,779
September	208,288	104,144	104,144	31,972	6,197
October	212,789	106,395	106,395	32,663	6,330
November	212,789	106,395	106,395	32,663	6,330
December	212,789	106,395	106,395	32,663	6,330
Total 2003 emissions for both lines:				234 tons	

Nailite is in the process of scheduling extensive emissions testing at its facility in December during which both lines will be tested individually and running simultaneously to determine capture efficiencies reliably. During these tests, the RTO destruction efficiency will be verified. It is requested that based on the test results a final determination will be made as to the permitted capture and destruction efficiency for the facility. Based on the above conservative projections, Nailite requests that FDEP extend the shut-down date for EU-001 until December 31, 2003.

Reductions in Emissions Projected for 2003

Thus far, it was shown that changes implemented at Nailite between 2000 and the end of 2002 resulted in a more than three-fold reduction in VOC emissions. The usage during the last three months of 2002 were projected as the monthly year-to-date (January to September) average. At an operation capacity cap of 6,240 hours per year the potential to emit, using a fairly conservative capture efficiency for EU-001 was shown to be 234 tons, well under the maximum limit for minor facilities under Rule 62-400. In order to be more conservative, additional reduction in the use of VOCs in 2003 were not considered up to this point. The following sections describe efforts underway at Nailite to further reduce its 2003 emissions from the projected 234 tons.

1. High Solids Paint – Nailite began implementing the use of high solids paints in July of 2002. Partial implementation, from July to December of 2002 will reduce VOC usage by close to 20,000 gallons. This means that without any further expansion in the use of high solids paints, the total reduction in VOC usage in 2003 will be an additional 20,000 gallons because the projected usage for 2003 was based on 2002 usage, which only benefited from 6 months of high solids paint use. In addition, Nailite is still in the process of converting existing paint formulations to high solid paints and will be doing so well into 2003. Nailite estimates that by the end of 2002, approximately 85 to 90%

of all convertible paints will be high solids. Nailite is also starting to investigate the possibility of using UV curable paints and is researching this possibility with local paint manufacturers. Although this process is not anticipated to be implemented in the near future, its realization would allow the use of paints consisting of 90 % solids and only 10 % solvents. Nailite estimates that by the beginning of 2004 UV curable paints could be brought on line gradually. Complete transition to UV curable paints could additionally cut emissions by more than half.

2. Paintless Operation – Nailite is among the last remaining manufacturers of plastic siding to use painting. The reason for this lies in Nailite's quality consciousness. Until recently, Nailite could not duplicate the same quality without painting as the final finishing step. Nailite is, however on the verge of achieving almost identical product quality by molding solid colored product and expects that by the end of 2002, this process will eliminate an additional 15 % of VOCs from its manufacturing process.
3. Improvement of Duct Work and Filtration – Re-design of the duct work currently in place will result in an increase in capture efficiency of both lines. The new design improves air movement through the duct work by eliminating corners and employing circular cross section of the ducts.

Summary

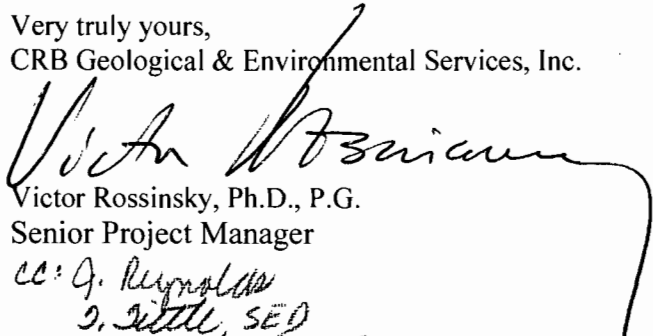
Through a number of emission controls and continued research and development, Nailite achieved a three-fold reduction in emissions from close to 450 tons per year to approximately 150 tons per year. Projected future emissions at a self imposed operations cap of 6240 hours per year would keep the facility well under the threshold of a major facility (250 tons per year). Reductions in VOC emissions planned for 2003, and already underway, will result in additional significant reductions in VOC emissions. In the interest of presenting FDEP with conservative estimates, future reduction in VOC usage were not taken into account in calculating emissions rates for 2003. The calculations themselves utilized a conservative capture efficiency of 70 % for EU-001. EU-004 capture efficiency was kept at the BACT determination of 95 %. Destruction efficiency of 99 %, which is lower than the actual measured destruction efficiency was utilized.

Based on the above, Nailite requests that permit 0250407-003-AC (PSD-FL-289) be reissued with the following modifications:

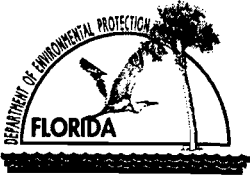
1. extend the shut-down date for EU-001 to December 31, 2003
2. Utilize results from emissions testing scheduled for December 2002 to establish capture and destruction efficiency requirements.
3. Incorporate operations cap of 6,240 hours per year to insure status of minor facility with respect to Rule 62-400.

Per your request, the first pages of Form No. 62-210.900(1) are included as attachment. If you have any questions or concerns, please don't hesitate to contact me at (305) 447-9777.

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


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

cc: G. Reynolds
D. Little, SED
M. Mathias, DEAM



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

I. APPLICATION INFORMATION

Identification of Facility

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

Application Contact

1. Name and Title of Application Contact: Mr. John Perry, Vice President of Operations		
2. Application Contact Mailing Address: (same as above) Organization/Firm: Street Address: City: State: Zip Code:		
3. Application Contact Telephone Numbers: Telephone: (305) 620-6200 x241 Fax: (305) 623-8227		

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	11-20-02
2. Permit Number:	0250407-005-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

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

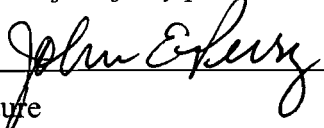
- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.
Current construction permit number: _____
- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.
Current construction permit number: _____
Operation permit number to be revised: _____
- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)
Operation permit number to be revised/corrected: _____
- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.
Operation permit number to be revised: _____
Reason for revision: _____

Air Construction Permit Application

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

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

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Mr. John Perry, Vice President of Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Mr. John Perry, Vice President of Operations Street Address: 1111 NW 165 th Street City: Miami State: FL Zip Code: 33169
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (305) 620-6200 x241 Fax: (305) 623-8227
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> Signature  Date 11-19-02

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Raymond Baddour Registration Number: 56633
2. Professional Engineer Mailing Address: Organization/Firm: CRB Geological & Environmental Services, Inc. Street Address: 4573 Ponce de Leon Blvd. City: Coral Gables State: FL Zip Code: 33146
3. Professional Engineer Telephone Numbers: Telephone: (305) 447-9777 Fax: (305) 567-2853

4. Professional Engineer Statement:

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

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

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

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

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

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], 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.



Raymond F. Balgour
Signature

Nov. 15, 2002
Date

* Attach any exception to certification statement.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Nailite requests permit condition modifications in order to re-engineer existing production and emission units EU 001 and EU 004 to foster continued significant reduction in air emission rates. Continued engineering research and design engineering efforts by Nailite's staff to improve RTO intake and capture efficiencies and to additionally improve paint transfer efficiencies will result in significant decrease in air emission of HAPs and VOCs.

Nailite's goal is to become a Minor Facility under PSD (rather than its current status as a PSD Major Facility) in 2003.

2. Projected or Actual Date of Commencement of Construction: 01 May 00

3. Projected Date of Completion of Construction: 31 Dec 03

Application Comment

Section A.5 of Nailite's Title V Permit requires the shutdown and discontinuance of operation of Paint Line Number 1 (Emission Unit 001) by January 1, 2003. Nailite is requesting that this mandate be extended to January 1, 2004 to allow continuing engineering research to be conducted based on accurate capture and destruction efficiency test results currently scheduled for December 10th and 11th, 2002 that is expected to more appropriately reflect true current operating conditions. This testing will be conducted in close coordination with the FDEP, DERM, Koogler and Associates, CRB, and Nailite and will provide a reliable baseline for Nailite's current emission situation. With over a threefold reduction in emissions over the last two years and scheduled improvements and changes to the manufacturing process scheduled for 2003, which will result in further emissions reductions, Nailite's request to extend the shut-down date for EU-001 is justifiable.

Nailite's chosen strategy is to extend the life of the EU-001 until changes in the painting portion of the manufacturing process result in adequate paint usage reduction so that only one paint line will be required. This strategy has already had a tremendous impact on emissions rates, having resulted in a threefold emissions reduction of the last three years, and will continue to result in emissions reductions in 2003. Nailite estimates that by the end of 2003, EU-001 will no longer be required. It is critical to note that the planned January 1, 2003 shutdown of EU-001 would force Nailite into a position to discontinue the aforementioned engineering research and focus on construction efforts of a new paint line. A capital expenditure of this magnitude would and could not include future engineering efforts aimed at making the new paint line obsolete within one year of its purchase. Allowing operation of EU-001 with continued efforts in reducing the use of VOCs until the end of 2003 is singularly the best option from an operational, business, and environmental standpoint.

