

Golder Associates Inc.

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



April 14, 2000

RECEIVED⁰⁰³⁷⁵²³

APR 17 2000

BUREAU OF AIR REGULATION

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 Spray Line

Dear Mr. Linero:

0250407-003-AC

PSD-FI-289

Please find enclosed seven copies of a Prevention of Significant Deterioration (PSD) Permit application for the New Panel Finishing Spray Line proposed by Nailite International, Inc. The permit application fee of \$7,500 is also enclosed. Golder has had pre-application discussions with Jeff Koerner regarding this project.

Please call if there are any technical questions on the application. Your assistance is always appreciated.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in cursive script, appearing to read 'Benny Susi'.

Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042

BS/jkk

Enclosures

cc: David Steedman, Nailite

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
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April 14, 2000

RECEIVED 0037523

APR 17 2000

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New Source Review Section
2600 Blair Stone Road
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BUREAU OF AIR REGULATION

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Sincerely,

GOLDER ASSOCIATES INC.

Benny Susi, P.E.
Principal Engineer
Florida P.E. #35042



1251 NORTHWEST 165TH ST.
MIAMI, FL 33169
Telephone: (305) 620-6200
Fax: (305) 620-5760



0068

63-568
631

PAY NAILITE 7500.00

DATE 4/11/00 AMOUNT \$7,500.00

TO THE ORDER OF DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

APR 17 2000

BUREAU OF AIR REGULATION

**PSD PERMIT APPLICATION
FOR
NEW PANEL FINISHING SPRAY LINE
NAILITE INTERNATIONAL, INC.**

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

**Prepared By:
Golder Associates Inc.
1801 Clint Moore Road, Suite 200
Boca Raton, Florida 33487
and
Golder Associates Inc.
6241 NW 23rd Street, Suite 500
Gainesville, Florida, 32653-1500**

**April 2000
0037523Y/F1**

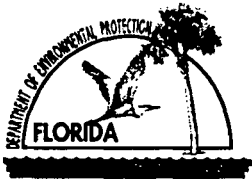
DISTRIBUTION:

**7 Copies - Florida Department of Environmental Protection
2 Copies - Nailite International, Inc.
2 Copies - Golder Associates Inc.**

Golder Associates

PART A

AIR PERMIT APPLICATION



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 0250407 [] Unknown	
4. Facility Location: Street Address or Other Locator: 1111 NW 165th Street City: Miami County: 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: Howard F. Wasserman, President and CEO	
2. Application Contact Mailing Address: Organization/Firm: Nailite International, Inc. Street Address: 1111 NW 165th Street City: Miami State: FL Zip Code: 33169	
3. Application Contact Telephone Numbers: Telephone: (305) 620-6200 Fax: (305) 623-8227	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	April 17, 2000
2. Permit Number:	0250407-003-AC
3. PSD Number (if applicable):	PSD-F1-289
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

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

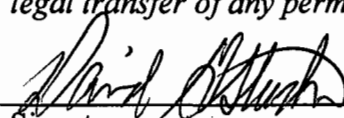
- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a 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: David G Steedman, Vice President of Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Nailite International, Inc. Street Address: 1111 NW 165th Street City: Miami State: FL Zip Code: 33169
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (305) 620 - 6200 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 <u>4-12-00</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Benny Susi Registration Number: 35042
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc. Street Address: 1801 Clint Moore Rd, Suite 105 City: Boca Raton State: FL Zip Code: 33487
3. Professional Engineer Telephone Numbers: Telephone: (561) 994 - 9910 Fax: (561) 994 - 9393

4. Professional Engineer Statement:

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

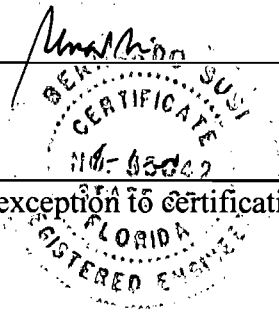
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions 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 [X], 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.

Signature *[Handwritten Signature]*
(seal) 

Date April 11, 2000

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
-	No. 2 Panel Finishing Spray Line	AC1A	7,500

Application Processing Fee

Check one: Attached - Amount: \$: 7,500 Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Addition of a new panel finishing spray line consisting of 3 spray coating booths, an electric oven, and a thermal oxidizer.

2. Projected or Actual Date of Commencement of Construction: **1 May 00**

3. Projected Date of Completion of Construction: **31 Mar 01**

Application Comment

[Empty box for Application Comment]

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

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

Facility Contact

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

Facility Regulatory Classifications

Check all that apply:

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

List of Applicable Regulations

Not Applicable	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
VOC	A				Volatile Organic Compounds
H169	A				Toluene
PM	B				Particulate Matter - Total
PM ₁₀	B				Particulate Matter - PM ₁₀
H186	A				Xylene

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: <u>NI-FI-E1</u> [] Not Applicable [] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: <u>NI-FI-E2</u> [] Not Applicable [] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: <u>NI-FI-E3</u> [] Not Applicable [] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [] Attached, Document ID: <u> </u> [X] Not Applicable [] Waiver Requested
5. Fugitive Emissions Identification: [X] Attached, Document ID: <u>Attachment A</u> [] Not Applicable [] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID: <u>Attachment A</u> [] Not Applicable
7. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

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

ATTACHMENT NI-FI-E1

AREA MAP

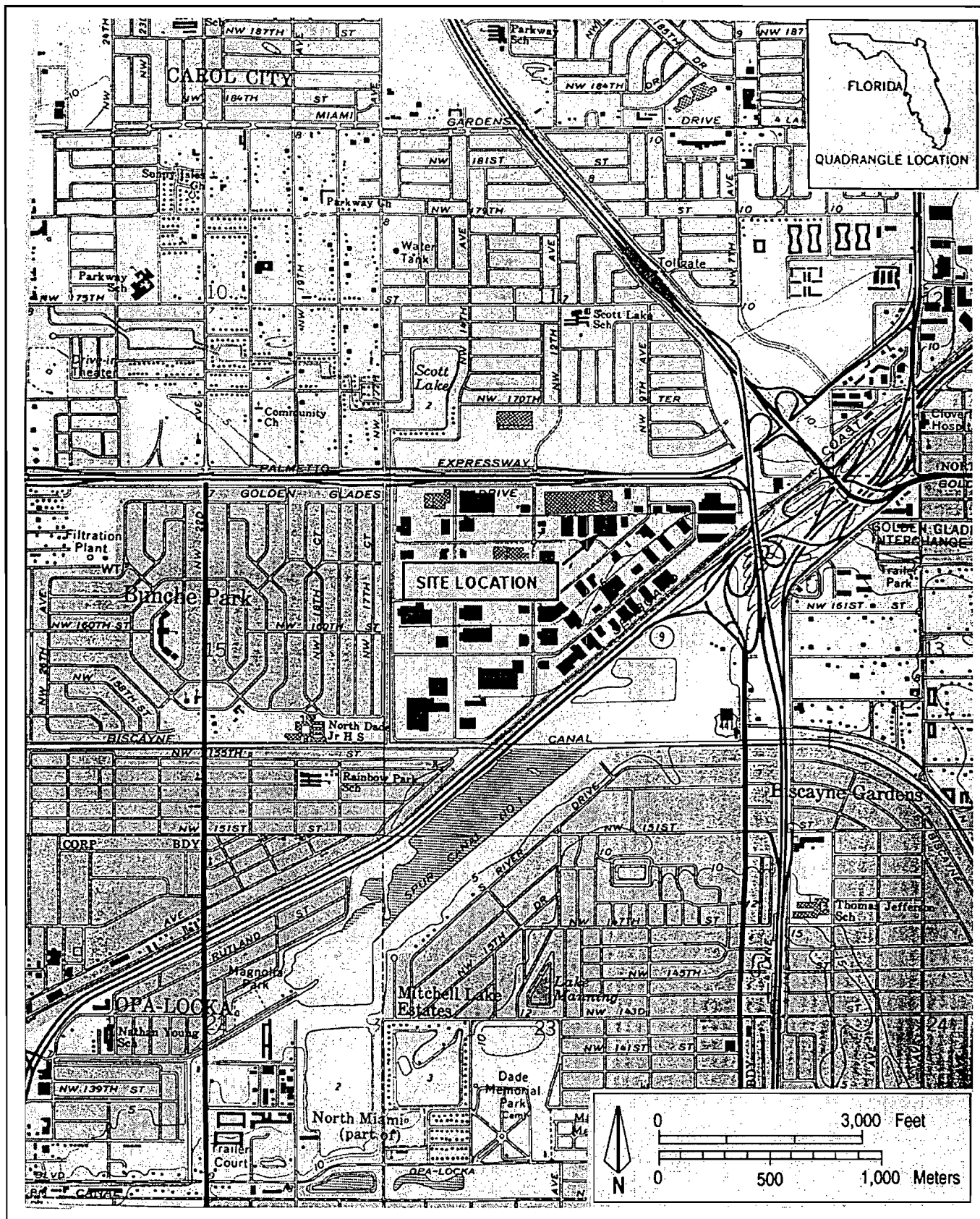


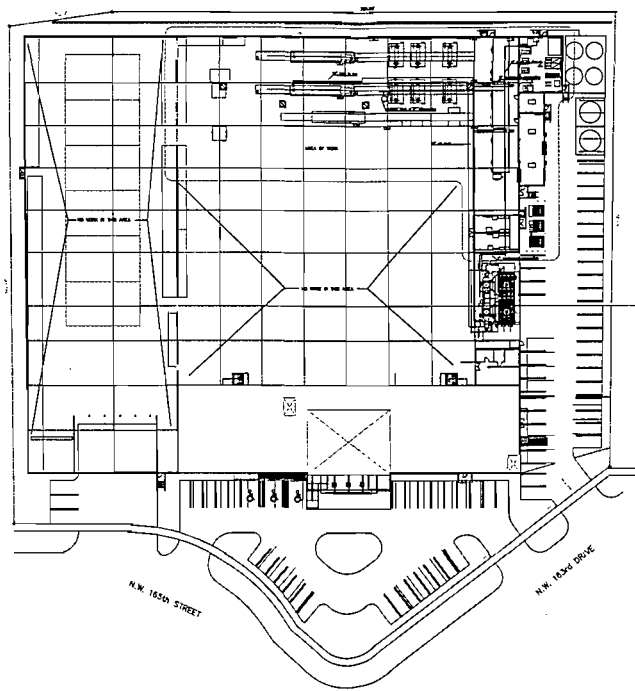
Figure NI-FI-E1
 Location of Nailite International

Sources: USGS, 1972; Golder, 2000.



ATTACHMENT NI-FI-E2

FACILITY PLOT PLAN



Process Flow Legend

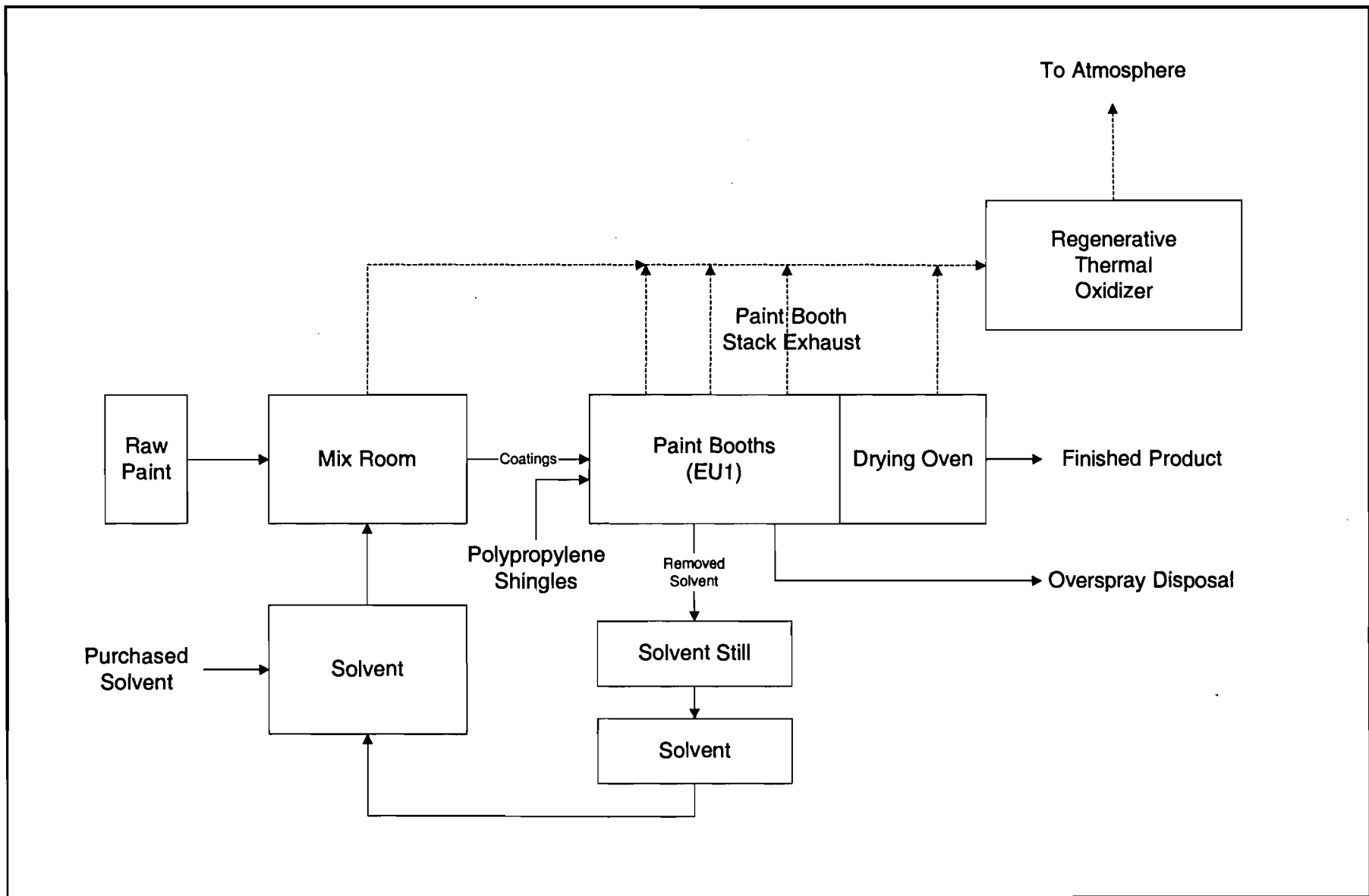
Gas	→	Control Cabinet
Steam	→	Exhaust Cabinet

Figure 2-1. Nailite Facility Drawing

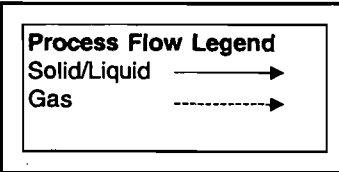
0037523Y/F1/WP/site.dwg



ATTACHMENT NI-FI-E3
PROCESS FLOW DIAGRAM



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



Filename: 0037523Y/F1/WP/FLOW.VSD (NI-FI-E3)
 Date: 04/11/00



III. EMISSIONS UNIT INFORMATION

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

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">New Spray Booths, Oven and Thermal Oxidizer</p>			
<p>4. Emissions Unit Identification Number: ID:</p>		<p><input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: C</p>	<p>6. Initial Startup Date:</p>	<p>7. Emissions Unit Major Group SIC Code: 30</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters)</p> <p>The emission unit consists of three spray paint booths exhausting through a thermal oxidizer. Other sources which are considered part of this process and which the emissions are accounted for in this emission unit are fugitive emissions from the product conveyers and an electric curing oven to dry the shingles after the painting process.</p>			

Emissions Unit Control Equipment

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

Panel Filter

Thermal Oxidizer

Low Solvent Coating

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

Emissions Unit Details

1. Package Unit:

Manufacturer:

Model Number:

2. Generator Nameplate Rating:

MW

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

1,600 °F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

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

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-210.300 (1) – Air Construction Permits
62-296.320 (1)(a) – Volatile organic compounds emissions
62-296.500 (1) – Applicability – RACT
62-296.500 (2)(a) 1 and 2 – Permits – special consideration
62-296.500 (2)(b) – Recordkeeping
62-296.500 (4) – Consideration of exempt solvents
62-296.500 (6) – Specific Emission Limitations
62-296.570 (1) – Applicability
62-296.570 (2) – Compliance
62-296.570 (3) – Operation Permit Requirements
62-296.570 (4) – RACT emissions limiting standards
62-296.570 – RACT Requirements for major VOC and NO_x-emitting facilities

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? EU1		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: 30 feet	7. Exit Diameter: 3.67 feet	
8. Exit Temperature: 229 °F	9. Actual Volumetric Flow Rate: 27,000 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Emissions associated with the three spray booths are individually vented through a single thermal oxidizer. Stack parameters are for the thermal oxidizer.			

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 2

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

Segment Description and Rate: Segment 2 of 2

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

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

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 6 lb VOC/gal coat/ 95% destroyed	4. Equivalent Allowable Emissions: 53.1 lb/hour 130.5 tons/year
5. Method of Compliance (limit to 60 characters): monthly recordkeeping	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): Proposed MACT	

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control: %	
3. Potential Emissions: 1.94 lb/hour		4. Synthetically Limited? [X] 4.66 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: See Attachment NI-EU1-H8 Reference: Manufacturer's Info		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Attachment NI-EU1-H8. Includes emissions from spraying of coating and from fuel burning in thermal oxidizer.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Assume 25% overspray. Filter pads removal efficiency is 95%.			

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

1. Pollutant Emitted: PM₁₀		2. Total Percent Efficiency of Control: %	
3. Potential Emissions: 1.94 lb/hour		4. Synthetically Limited? [X]	
4.66 tons/year			
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 100% PM Reference: Conservative Assumption		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Attachment NI-EU1-H8. Includes emissions from spraying of coating and from fuel burning in thermal oxidizer.			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Assume 25% overspray. Filter pad removal efficiency is 95%.			

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

1. Pollutant Emitted: H169		2. Total Percent Efficiency of Control: %	
3. Potential Emissions: 37.2 lb/hour		4. Synthetically Limited? [<input checked="" type="checkbox"/>] 91.35 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 70% of VOC emissions Reference: MSDS (See Comment)		7. Emissions Method Code: 3	
8. Calculation of Emissions (limit to 600 characters): 53.1lb VOC/hr x 70% = 37.2 lb H169/hr 130.5 tons VOC/yr x 70% = 91.35 TPY			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

1. Pollutant Emitted: H186	2. Total Percent Efficiency of Control: %
3. Potential Emissions: 1.0 lb/hour 2.6 tons/year	4. Synthetically Limited? [<input checked="" type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 2% of VOC emissions Reference: MSDS (See Comment)	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): 53.1 lb VOC/hr x 2% = 1.0 lb/hr 130.5 tons VOC/yr x 2% = 2.6 TPY	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂		2. Total Percent Efficiency of Control: %	
3. Potential Emissions: 0.004 lb/hour 0.0009 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.6 lb/MMscf Reference: AP-42		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Attachment NI-EU1-H8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control: %	
3. Potential Emissions: 0.60 lb/hour		4. Synthetically Limited? [] 0.12 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 84 lb/MMscf Reference: AP-42		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Attachment NI-EU1-H8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

1. Pollutant Emitted: NO_x		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2.0 lb/hour 0.4 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 280 lb/MMbtu Reference: AP-42		7. Emissions Method Code: 2	
8. Calculation of Emissions (limit to 600 characters): See Attachment NI-EU1-H8			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

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

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

Potential/Fugitive Emissions

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

Allowable Emissions Allowable Emissions _____ of _____

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

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

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

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

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

Continuous Monitoring System: Continuous Monitor _____ of _____

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

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

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

Additional Supplemental Requirements for Title V Air Operation Permit Applications

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

ATTACHMENT NI-EU1-H8
CALCULATIONS OF EMISSIONS

Attachment NI-EU1-H8a. Maximum Potential VOC Emissions for No. 2 Spray Line, Nailite

Product	Maximum Paint Usage		Maximum VOC Content (lb/gal)	Potential Uncontrolled VOC		Fugitive Emissions (a)		VOC to Thermal Oxidizer (b)		VOC from Thermal Oxidizer (c)		Total VOC Emissions	
	gal/hr	gal/yr		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (TPY)	lb/hr	TPY
<u>Coatings</u>													
Maximum Hourly	61	--	6.0	366.0	--	36.6	--	329.4	--	16.47	--	53.1	--
Maximum Annual	--	300,000	6.0	--	900.0	--	90.0	--	810.0	--	40.5	--	130.5

Notes:
 VOC = volatile organic compounds
 TPY = tons per year

- (a) Based on estimated 90% capture of VOC in paint booths, and 10% fugitive emissions.
- (b) Based on 90% capture of VOC in paint booths.
- (c) Based on 95% VOC destruction in thermal oxidizer.

Attachment NI-EU1-H8b. Maximum Potential PM and Combustion Related Emissions, Nailite

Parameter	Paint Booths	Thermal Oxidizer		Total				
OPERATING DATA								
Operating Time (hr/yr)	8,760	8,760						
Paint Usage Rate (gal/hr)	61	--						
Paint Usage Rate (gal/yr)	300,000	--						
Heat Input Rate (MMscf/hr)	--	0.00715 (d)						
Heat Input Rate (MMscf/yr)	--	2.860 (d)						
Pollutant	Emission Factor	Paint/Solvent		Natural Gas		Total Emissions		
		lb/hr	TPY	Emission Factor (c)	lb/hr	TPY	lb/hr	TPY
PM	Footnote (a)	1.89	4.65	7.6 lb/MMscf	0.054	0.0109	1.94	4.66
PM10	100% of PM (b)	1.89	4.65	100% of PM	0.054	0.0109	1.94	4.66
SO2	--	--	--	0.6 lb/MMscf	0.0043	0.00086	0.004	0.00086
NO _x	--	--	--	280 lb/MMscf	2.00	0.40	2.00	0.40
CO	--	--	--	84 lb/MMscf	0.60	0.120	0.60	0.120

Note: NA = not applicable.

(a) Based on 25% solids, maximum density of 9.91 lb/gal, 25% overspray, and 95% filter efficiency.

(b) Conservative assumption.

(c) AP-42 factors for natural gas firing (Section 1.4).

(d) Based on 400 hrs. of start-up per year at 7.15 MMBtu/hr.

ATTACHMENT NI-EU1-J3
DETAILED DESCRIPTION OF CONTROL EQUIPMENT

SYSTEM ENERGY CALCULATION:

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

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

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

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

PART B

ATTACHMENT A
PSD ANALYSIS

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION.....	1-1
2.0 PROJECT DESCRIPTION.....	2-1
2.1 SITE AND PROJECT DESCRIPTION	2-1
2.1.1 FLUID HANDLING SYSTEM.....	2-1
2.1.2 APPLICATION SYSTEM	2-2
2.1.3 SPRAY BOOTHS	2-3
2.1.4 SYSTEM CONTROLLER.....	2-3
2.1.5 OVEN SYSTEM.....	2-4
2.1.6 THERMAL OXIDIZER.....	2-4
2.2 FUTURE MAXIMUM AIR EMISSIONS.....	2-4
3.0 AIR QUALITY REVIEW REQUIREMENTS AND APPLICABILITY	3-1
3.1 PSD REQUIREMENTS	3-1
3.1.1 GENERAL REQUIREMENTS	3-1
3.1.2 CONTROL TECHNOLOGY REVIEW	3-1
3.1.3 AIR QUALITY MONITORING REQUIREMENTS.....	3-1
3.1.4 SOURCE INFORMATION/GOOD ENGINEERING PRACTICE STACK HEIGHT	3-1
3.1.5 ADDITIONAL IMPACT ANALYSIS	3-1
3.2 NONATTAINMENT RULES	3-1
3.3 EMISSION STANDARDS.....	3-1
3.3.1 NEW SOURCE PERFORMANCE STANDARDS.....	3-1
3.3.2 REASONABLY AVAILABLE CONTROL TECHNOLOGIES	3-1
3.4 FLORIDA AIR PERMITTING REQUIREMENTS.....	3-1
3.5 SOURCE APPLICABILITY.....	3-1
3.5.1 AREA CLASSIFICATION	3-1
3.5.2 PSD REVIEW.....	3-1
3.5.3 NONATTAINMENT REVIEW.....	3-1

TABLE OF CONTENTS
(continued)

3.5.4 NSPS/RACT REQUIREMENTS 3-1

4.0 AMBIENT MONITORING ANALYSIS 4-1

 4.1 INTRODUCTION..... 4-1

 4.2 AMBIENT OZONE CONCENTRATIONS 4-1

5.0 CONTROL TECHNOLOGY REVIEW 5-1

 5.1 APPLICABILITY..... 5-1

 5.2 MAXIMUM AVAILABLE CONTROL TECHNOLOGY..... 5-1

 5.3 BEST AVAILABLE CONTROL TECHNOLOGY 5-1

6.0 ADDITIONAL IMPACT ANALYSIS 6-1

LIST OF TABLES

3-1 PSD Significant Emission Rates and *De Minimis* Monitoring Concentrations..... 3-9

3-2 Maximum Emissions Due to the Proposed Finish Spray Line Compared to the
PSD Significant Emission Rates 3-10

4-1 Summary of Ozone Ambient Monitoring Data from Miami..... 4-3

LIST OF APPENDICES

APPENDIX A MSDS SHEETS

TABLE OF CONTENTS**LIST OF ACRONYMS AND ABBREVIATIONS**

AAQS	ambient air quality standards
acfm	actual cubic feet per minute
AIRS	Aerometric Information Retrieval System
BACT	best available control technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEP	Department of Environmental Protection
EPA	U.S. Environmental Protection Agency
F.A.C.	Florida Administrative Code
ft	foot
GEP	good engineering practice
Golder	Golder Associates Inc.
HAP	hazardous air pollutant
HSH	highest, second-highest
km	kilometer
kV	kilovolt
LEL	lower explosive limit
MACT	maximum available control technology
m ³	cubic meters
MW	megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NET	National Emission Trends
NO ₂	nitrogen dioxide
NO _x	nitrogen oxide
NP	National Park
NSPS	new source performance standards
NSR	new source review

TABLE OF CONTENTS**LIST OF ACRONYMS AND ABBREVIATIONS**

O ₃	ozone
PM	particulate matter
PM ₁₀	particulate matter with aerodynamic diameter of 10 microns or less
ppm	parts per million
PSD	prevention of significant deterioration
RTO	regenerative thermal oxidizer
SIP	Florida's State Implementation Plan
SO ₂	sulfur dioxide
TPY	tons per year
TSP	total suspended particulate matter
TTN	Technology Transfer Network
μg/m ³	micrograms per cubic meter
USC	United States Code
VOC	volatile organic compound

1.0 INTRODUCTION

Nailite International, Inc, (Nailite) located at 1251 NW 165th Street in Miami, Dade County, Florida, is proposing to construct and operate a new panel finishing spray line. The new line will be located at a new warehouse facility located at 1111 NW 165th Street in Miami, approximately 500 feet west of Nailite's existing operations (see Attachment NI-FI-E1). Nailite is engaged in the manufacturing of polypropylene shingles. The new facility will operate in a non-contiguous manner with their existing operations until after the proposed spray line is constructed. Subsequently, the exiting operations will be relocated to the new building location. The facility will receive polypropylene pellets by rail cars, which will be stored in two on-site silos. Ten molding machines will be used to form the polypropylene pellets into the shingles. The shingles will then be coated on the proposed finishing spray line with acrylic lacquers.

This project requires an air construction permit and prevention of significant deterioration (PSD) review. To assist in performing the necessary licensing activities, Nailite contracted Golder Associates Inc. (Golder) to perform the necessary air quality assessments for determining the project's compliance with state and federal new source review (NSR) regulation. The critical aspect of this assessment was the best available control technology (BACT) and maximum available control technology (MACT) analyses performed to evaluate the selected emission control technology.

The proposed project is located at a major emitting facility and will be an air pollution source that will result in increases in potential air emissions. The U.S. Environmental Protection Agency (EPA) has implemented regulations for facilities requiring a PSD review. The PSD regulations are promulgated under 40 Code of Federal Regulations (CFR) Part 52.21 and implemented through delegation to the Florida Department of Environmental Protection (DEP). Florida's PSD regulations are codified in Rules 62-212.400, Florida Administrative Code (F.A.C.). Florida's regulations incorporate the EPA PSD regulations.

Based on the emissions from the proposed project, a PSD review is required for volatile organic compounds (VOC), a regulated pollutant. A case-by case MACT determination for toluene, a hazardous air pollutant (HAP). is also required under 40 CFR Part 63.

Dade County has been designated as an attainment or unclassifiable area for all criteria pollutants [i.e., attainment: ozone (O₃), PM₁₀, SO₂, CO, and NO₂; unclassifiable: lead] and is classified as a PSD Class II area for PM₁₀, SO₂, and NO₂; therefore, the PSD review will follow the regulations pertaining to such designations.

The air permit application is divided into seven major sections.

- Section 2.0 presents a description of the new panel finishing spray line, including exhaust characteristics and stack parameters.
- Section 3.0 summarizes and reviews the PSD requirements applicable to the proposed project.
- Section 4.0 discusses the ambient air monitoring analysis (pre-construction monitoring) required by PSD regulations.
- Section 5.0 includes the control technology review with discussions on BACT/MACT.
- Section 6.0 provides the additional impact analyses for soils, vegetation, and visibility.

2.0 PROJECT DESCRIPTION

2.1 SITE AND PROJECT DESCRIPTION

Nailite manufactures polypropylene shingles used in the construction industry. Nailite is currently operating at 1251 NW 165th Street in Miami, Florida and is proposing to construct and operate a new panel finishing spray line at an existing warehouse located at 1111 NW 165th Street, approximately 500 feet west of their existing operations. After the new spray line is constructed, the existing spray line will be relocated to this same warehouse.

The project site, consists of an existing 120,000 square foot warehouse building that will house the new spray line, molding machines, shipping, distribution, and administrative offices (see Attachment NI-FI-E2 for site plan). The project elevation will be approximately 5 ft above sea level. The terrain surrounding the site is flat.

The proposed panel finishing spray line will consist of three spray booths operating in one continuous spray line, with a curing oven at the end of the spray line. The spray line has been designed to finish approximately 1,400 panels per hour. The panel sizes range from 20 inches by 40 inches to 20 inches by 60 inches. The finish system will be designed with three parallel conveyor, which form a 60-inch flat line conveyor system. The conveyor system will have an adjustable speed ranging from 10 to 30 feet per minute. The various components of the finishing spray line are listed below and discussed individually in more detail below:

- Fluid Handling System
- Application System
- Spray Booth
- System Controls
- Oven System
- Conveyor

2.1.1 FLUID HANDLING SYSTEM

The proposed coating delivery system for each spray booth consists of a ten-second color change system. Paint will be pumped from 55-gallon drums located in the paint mixing room. Each loop will be equipped with an "air pig" paint loop purge system. This will allow old paint

to be returned to a 55-gallon drum for reuse with little paint waste. The air pig is designed to recover 90 percent of the old paint from the circulation loop. The loop system must be flushed when new colors are changed. The fluid management system and spray guns will utilize an advance Secondary Heat Transfer System to provide heat control at the spray gun.

Each of the first two spray booths will be equipped with a Static Heat Stripping HP60 in-line paint heater. The heater is used to control the coating temperature to provide repeatable finishing results regardless of ambient temperature conditions. Maintaining the coating temperature at the spray guns at the viscosity flat line temperature will reduce the solvent usage by approximately 15 percent compared to Nailite's existing operations.

The third spray booth in the spray line will be utilized for shading. This booth will have six different colors supporting the application system. Each color will be pumped directly from 55-gallon drums. Each drum will have a wall mounted pump, required air controls, a siphon assembly, circulation control valve, a 55 gallon cover with air-powered agitator and cover lift assembly to keep pigmented colors in constant suspension through the loop. The fluid pressure will be regulated all the way to the spray gun and the six circulation loops will be equipped with a secondary heat transfer system to provide constant controlled heat transfer.

2.1.2 APPLICATION SYSTEM

Eight spray guns will be used in Spray Booth Nos. 1 and 2. Each spray booth is equipped with a constant speed gun mover with a stroke travel of seven feet. The guns are automatically toed away from the direction of the gun mover travel to allow the atomized velocity of 2 feet per second to work with the gun tip speed of 150 feet per minute. This allows for a higher application transfer efficiency and minimizes the overspray in the spray booth. Spray Booth No. 3 will be identical to Spray Booth Nos. 1 and 2; however, it will be equipped with HVLP guns.

The proposed spray line will reduce the amount of solvent usage by approximately 29 percent as compared to Nailite's existing spray line. This improved transfer efficiency will result in a significant reduction in VOC and HAP emissions.

2.1.3 SPRAY BOOTHS

The proposed spray booths are designed with a closed-faced side draft booth with built in air-circulation. The only opening in the spray booth will be the conveyor slot which will be 6-ft wide and one foot tall. Air movement within the booth will be maintained at 100 feet per minute. A circulation fan will circulate the air in the spray booth into the exhaust filters at the rear of the spray booth. The filtered air is then repressurized and ducted back to the inlet plenum mounted in front of the spray booth on the roof. The plenum will uniformly reintroduce the circulation air back into the spray booth. This process will maintain a uniform 100 feet per minute airflow without interference from outside air flows.

The spray booths will be 10 ft wide, 16 ft 4 inch deep and 8 ft tall. The working depth of the booths will be 12 ft. Each booth will be equipped with a 9,200 cfm recirculation fan at 1/4 inch static pressure. The VOC build up (in the booth) will be maintained under the lower explosive limit (LEL) level by a bleed air duct. The bleed air will be controlled to 1,200 cfm by dampers. The bleed air duct from each booth will be directed to a regenerative thermal oxidizer (RTO) for VOC/HAP destruction (see Section 2.1.6).

Paint filters will be used to control particulate emissions from the spray booth operations. Accordion-type filters with a 95% percent minimum efficiency are proposed for the project.

2.1.4 SYSTEM CONTROLLER

The controls for the finishing system will be contained in a system controller panel located at each of the three spray booths. Each panel provides remote fluid pressure control to the fluid pressure controls in each spray booth. Spray Booth Nos. 1 and 2 have two remote fluid pressure regulators, while Spray Booth No. 3 has six controls. The guns are interlocked into the system controller. If the spray booth exhaust fan is not operating, the guns will not spray in either automatic or manual modes.

2.1.5 OVEN SYSTEM

The electric oven will be designed to heat the coated panels with hot air impinged onto the top surfaces of the panels near the oven entrance, in order to begin rapid evaporation of the solvents and create a flow of air to the return duct near the oven exit. The oven will be 45 ft long, 6 ft 10 inches wide, and 3 ft high. A circulation blower will be utilized rated at 8,000 cfm at 2.5 static pressure with a 10 hp motor. The exhaust from the oven will be vented to the RTO.

2.1.6 THERMAL OXIDIZER

Emissions from the panel finishing operations will be controlled using a twin bed RTO. The RTO will be designed for a process gas flow rate of 27,000 acfm and 95 percent destruction efficiency. Propane will be used at start-up as a secondary fuel, while the captured solvent will be the primary fuel. A simplified process flow diagram for the new panel finishing spray line is presented in Attachment NI-FI-E3.

2.2 FUTURE MAXIMUM AIR EMISSIONS

The maximum potential emissions from the new finishing spray line are presented in Attachments NI-EU1-H8a and H8b. VOC emissions are quantified in Attachment NI-EU1-H8a and other pollutants are quantified in Attachment NI-EU1-H8b. Based on design of the new spray line, as well as operating experience on the existing spray line, approximately 90 percent of the VOC/HAP in the coating will be released in the paint booths. It is therefore assumed that 10 percent of the VOC/HAPs are emitted into the building as fugitive emissions. Emissions of particulate matter are based on 25 percent overspray of coating in the booths, and 95 percent removal from the paint filter pads.

Total maximum emissions from the proposed spray line are as follows:

- SO₂ – 0.00086 TPY
- NO_x – 0.40 TPY
- PM – 4.66 TPY
- PM₁₀ – 4.66 TPY
- CO – 0.120 TPY
- VOC – 130.5 TPY

3.0 AIR QUALITY REVIEW REQUIREMENTS AND APPLICABILITY

The following discussion pertains to the federal and state air regulatory requirements and their applicability to the proposed project.

3.1 PSD REQUIREMENTS

3.1.1 GENERAL REQUIREMENTS

Federal PSD requirements are contained in the CFR, Title 40, Part 52.21, and PSD of air quality. The state of Florida has adopted PSD regulations (Rule 62-212.400) that are essentially identical to the federal regulations. Florida's State Implementation Plan (SIP), which contains PSD regulations, has been approved by EPA; therefore, PSD approval authority has been granted to DEP. PSD regulations require that all new major stationary facilities or major modifications to existing major facilities, which emit air pollutants regulated under the Clean Air Act (CAA), must be reviewed and a permit issued before the commencement of construction.

A "major facility" is defined as any one of 28 named source categories that have the potential to emit 100 tons per year (TPY) or more, or any other stationary facility that has the potential to emit 250 TPY or more, of any pollutant regulated under CAA. "Potential to emit" means the capability, at maximum design capacity, to emit a pollutant after the application of control equipment.

Subject to certain exceptions, a "major modification" is defined under PSD regulations as a physical or operational change at an existing major facility that increases the facility's emissions by an amount that is greater than the defined significant emission rates. PSD significant emission rates are shown in Table 3-1.

PSD review is used to determine whether significant air quality deterioration will result from the new or modified facility. Federal PSD requirements are contained in 40 CFR 52.21, *Prevention of Significant Deterioration of Air Quality*. The State of Florida has adopted PSD regulations which have been approved by EPA [Rule 62-212.400 F.A.C.]. Major facilities and major modifications are required to undergo the following analysis related to PSD for each pollutant emitted in significant amounts:

1. Control technology review,
2. Source impact analysis,
3. Air quality analysis (monitoring),
4. Source information, and
5. Additional impact analyses.

3.1.2 CONTROL TECHNOLOGY REVIEW

The control technology review requirements of the federal and state PSD regulations require that all applicable federal and state emission-limiting standards be met, and that BACT be applied to control emissions from the source (Rule 62-212.410, F.A.C.). The BACT requirements are applicable to all regulated pollutants for which the increase in emissions from the facility or modification exceeds the significant emission rate (see Table 3-1).

BACT is defined in 52.21 (b)(12) and Rule 62-210.200(40), F.A.C., as:

An emissions limitation (including a visible emission standard) based on the maximum degree of reduction of each pollutant subject to regulation under the Act which would be emitted by any proposed major stationary source or major modification which the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of such pollutant. In no event shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 CFR Parts 60 and 61. If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particular part of a source or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice, or operation and shall provide for compliance by means which achieve equivalent results.

BACT was promulgated within the framework of the PSD requirements in the 1977 amendments of the CAA [Public Law 95-95; Part C, Section 165(a)(4)]. The primary purpose of BACT is to optimize consumption of PSD air quality increments and thereby enlarge the potential for future economic growth without significantly degrading air quality (EPA, 1978;

1980). Guidelines for the evaluation of BACT can be found in EPA's *Guidelines for Determining Best Available Control Technology (BACT)* (EPA, 1978) and in the *PSD Workshop Manual* (EPA, 1980). These guidelines were promulgated by EPA to provide a consistent approach to BACT and to ensure that the impacts of alternative emission control systems are measured by the same set of parameters. In addition, through implementation of these guidelines, BACT in one area may not be identical to BACT in another area. According to EPA (1980), "BACT analyses for the same types of emissions unit and the same pollutants in different locations or situations may determine that different control strategies should be applied to the different sites, depending on site-specific factors. Therefore, BACT analyses must be conducted on a case-by-case basis."

The BACT requirements are intended to ensure that the control systems incorporated in the design of a proposed facility reflect the latest in control technologies used in a particular industry and take into consideration existing and future air quality in the vicinity of the proposed facility. BACT must, as a minimum, demonstrate compliance with new source performance standards (NSPS) for a source (if applicable). An evaluation of the air pollution control techniques and systems, including a cost-benefit analysis of alternative control technologies capable of achieving a higher degree of emission reduction than the proposed control technology, is required. The cost-benefit analysis requires the documentation of the materials, energy, and economic penalties associated with the proposed and alternative control systems, as well as the environmental benefits derived from these systems. A decision on BACT is to be based on sound judgment, balancing environmental benefits with energy, economic, and other impacts (EPA, 1978).

Historically, a "bottom-up" approach consistent with the BACT Guidelines and PSD Workshop Manual has been used. With this approach, an initial control level, which is usually NSPS, is evaluated against successively more stringent controls until a BACT level is selected. However, EPA became concerned that the bottom-up approach was not providing the level of BACT decisions originally intended. As a result, in December 1987, the EPA Assistant Administrator for Air and Radiation mandated changes in the implementation of the PSD program, including the adoption of a new "top-down" approach to BACT decision making.

The top-down BACT approach essentially starts with the most stringent (or top) technology and emissions limit that have been applied elsewhere to the same or a similar source category. The applicant must next provide a basis for rejecting this technology in favor of the next most stringent technology or propose to use it. Rejection of control alternatives may be based on technical or economic infeasibility. Such decisions are made on the basis of physical differences (e.g., fuel type), locational differences (e.g., availability of water), or significant differences that may exist in the environmental, economic, or energy impacts. The differences between the proposed facility and the facility on which the control technique was applied previously must be justified. EPA has issued a draft guidance document on the top-down approach entitled *Top-Down Best Available Control Technology Guidance Document* (EPA, 1990).

MACT requirements apply to all new major sources of HAPs (i.e., greater than 10 TPY of any single HAP, or greater than 25 TPY of total HAPs). MACT is defined in Rule 62-204.800(10)(d)2., F.A.C., as:

An emissions limitation not less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority. Based on the available information, ...the maximum degree of reduction in emissions of HAP which can be achieved by utilizing those controls technologies that can be identified from available information, taking into consideration costs of achieving such emission reduction and any non-air quality health and environmental impacts and energy requirements associated with the emission reduction.

MACT is more stringent than BACT. Therefore, for the purposes of this application, MACT will be considered as satisfying BACT requirements.

3.1.3 AIR QUALITY MONITORING REQUIREMENTS

In accordance with requirements of 40 CFR 52.21(m) and Rule 62-212.400(5)(f), F.A.C., any application for a PSD permit must contain an analysis of continuous ambient air quality data in the area affected by the proposed major stationary facility or major modification. For a new major facility, the affected pollutants are those that the facility potentially would emit in significant amounts. For a major modification, the pollutants are those for which the net emissions increase exceeds the significant emission rate (see Table 3-1).

Ambient air monitoring for a period of up to 1 year generally is appropriate to satisfy the PSD monitoring requirements. A minimum of 4 months of data is required. Existing data from the vicinity of the proposed source may be used if the data meet certain quality assurance requirements; otherwise, additional data may need to be gathered. Guidance in designing a PSD monitoring network is provided in EPA's *Ambient Monitoring Guidelines for Prevention of Significant Deterioration* (EPA, 1987a).

The regulations include an exemption that excludes or limits the pollutants for which an air quality analysis must be conducted. This exemption states that Florida DEP exempts a proposed major stationary facility or major modification from the monitoring requirements with respect to a particular pollutant if the emissions increase of the pollutant from the facility or modification would cause, in any area, air quality impacts less than the *de minimis* levels presented in Table 3-1 (Rule 62-212.400-3, F.A.C.).

3.1.4 SOURCE INFORMATION/GOOD ENGINEERING PRACTICE STACK HEIGHT

Source information must be provided to adequately describe the proposed project. The general type of information required for this project is presented in Section 2.0.

3.1.5 ADDITIONAL IMPACT ANALYSIS

In addition to air quality impact analyses, federal and State of Florida PSD regulations require analyses of the impairment to visibility and the impacts on soils and vegetation that would occur as a result of the proposed source [40 CFR 52.21(o); Rule 62-212.400(5)(e), F.A.C.]. These analyses are to be conducted primarily for PSD Class I areas. Impacts as a result of general commercial, residential, industrial, and other growth associated with the source also must be addressed. These analyses are required for each pollutant emitted in significant amounts (Table 3-1).

3.2 NONATTAINMENT RULES

Based on the current nonattainment provisions (Rule 62-212.500, F.A.C.), all major new facilities and modifications to existing major facilities located in a nonattainment area must undergo nonattainment review. A new major facility is required to undergo this review if the proposed

pieces of equipment have the potential to emit 100 TPY or more of the nonattainment pollutant. A major modification at a major facility is required to undergo review if it results in a significant net emission increase of 40 TPY or more of the nonattainment pollutant or if the modification is major (i.e., 100 TPY or more).

For major facilities or major modifications that locate in an attainment or unclassifiable area, the nonattainment review procedures apply if the source or modification is located within the area of influence of a nonattainment area. The area of influence is defined as an area that is outside the boundary of a nonattainment area but within the locus of all points that are 50 kilometers (km) outside the boundary of the nonattainment area. Based on Rule 62-2.500(2)(c)2.a., F.A.C., all VOC sources that are located within an area of influence are exempt from the provisions of NSR for nonattainment areas. Sources that emit other nonattainment pollutants and are located within the area of influence are subject to nonattainment review unless the maximum allowable emissions from the proposed source do not have a significant impact within the nonattainment area.

3.3 EMISSION STANDARDS

3.3.1 NEW SOURCE PERFORMANCE STANDARDS

The NSPS are a set of national emission standards that apply to specific categories of new sources. As stated in the CAA Amendments of 1977, these standards "shall reflect the degree of emission limitation and the percentage reduction achievable through application of the best technological system of continuous emission reduction the Administrator determines has been adequately demonstrated."

3.3.2 REASONABLY AVAILABLE CONTROL TECHNOLOGIES

Nailite is subject to the Rule 62-296.500, Reasonably Available Control Technology (RACT) for Volatile Organic Compounds (VOC) Emitting Facilities. This rule provides applies to existing VOC-emitting facilities in all designated ozone nonattainment and air quality maintenance areas. In addition, the emission limiting standards of the rules apply to new and modified VOC emission limiting facilities in all designated ozone nonattainment and air quality maintenance area....

The emission-limiting standard as set forth in Rule 62-296.500 for Nailite provides a limiting standard of 6 pound of VOC per gallon of coating applied. All volatile organic compounds emissions from solvent washings shall be considered in the emission limitations in Rule 62-296.500, F.A.C.

3.4 FLORIDA AIR PERMITTING REQUIREMENTS

The Florida DEP regulations require any new source to obtain an air permit prior to construction. Major new sources must meet the appropriate PSD and nonattainment requirements as discussed previously. Required permits and approvals for air pollution sources include NSR for nonattainment areas, PSD, NSPS, National Emission Standards for Hazardous Air Pollutants (NESHAP), Permit to Construct, and Permit to Operate. The requirements for construction permits and approvals are contained in Rules 62-4.030, 62-4.050, 62-4.052, 62-4.210, and 62-210.300(1), F.A.C. Specific emission standards are set forth in Chapter 62-296, F.A.C.

3.5 SOURCE APPLICABILITY

3.5.1 AREA CLASSIFICATION

The project site is located in Dade County, which has been designated by EPA and DEP as a maintenance area for all criteria pollutants. Dade County and surrounding counties are designated as PSD Class II areas for SO₂, PM (TSP), and NO₂. The nearest Class I areas to the site is the Everglades National Park (NP) which is about 35 km (22 miles) from the site.

3.5.2 PSD REVIEW

Pollutant Applicability

The proposed project is considered to be a major modification to an existing major facility because the potential emissions for the existing facility exceed the PSD major threshold of 250 TPY of any regulated pollutant. The potential increase in emissions due to the proposed project is estimated to exceed the significant emission rate for a regulated pollutant (VOC). The emissions increases are compared to PSD significant emission rates in Table 3-2. PSD review is required for each pollutant for which the emissions are considered major or exceed the PSD

significant emission rates (see Table 3-1). Therefore, the proposed finish spray line is subject to PSD review for VOC only.

Ambient Monitoring

Based on the estimated pollutant emissions from the proposed project, a pre-construction ambient air quality monitoring analysis is required for VOC emissions only.

In such a case, air quality monitoring analysis for ozone is required. The pre-construction ambient monitoring analysis is presented in Section 4.0.

3.5.3 NONATTAINMENT REVIEW

The project site is located in Dade County, which is classified as a maintenance area for all criteria pollutants. Therefore, nonattainment requirements are not applicable.

3.5.4 NSPS/RACT REQUIREMENTS

The RACT emission-limiting standard as set forth in Rule 62-296.500 for Nailite provides a limiting standard of 6 pound of VOC per gallon of coating applied. All volatile organic compound emissions from solvent washings shall be considered in the emission limitations in Rule 62-296.500, F.A.C.

Table 3-1. PSD Significant Emission Rates and *De Minimis* Monitoring Concentrations

Pollutant	Regulated Under	Significant Emission Rate (TPY)	<i>De Minimis</i> Monitoring Concentration ^a (µg/m ³)
Sulfur Dioxide	NAAQS, NSPS	40	13, 24-hour
Particulate Matter [PM (TSP)]	NSPS	25	10, 24-hour
Particulate Matter (PM ₁₀)	NAAQS	15	10, 24-hour
Nitrogen Dioxide	NAAQS, NSPS	40	14, annual
Carbon Monoxide	NAAQS, NSPS	100	575, 8-hour
Volatile Organic Compounds (Ozone)	NAAQS, NSPS	40	100 TPY ^b
Lead	NAAQS	0.6	0.1, 3-month
Sulfuric Acid Mist	NSPS	7	NM
Total Fluorides	NSPS	3	0.25, 24-hour
Total Reduced Sulfur	NSPS	10	10, 1-hour
Reduced Sulfur Compounds	NSPS	10	10, 1-hour
Hydrogen Sulfide	NSPS	10	0.2, 1-hour
Mercury	NESHAP	0.1	0.25, 24-hour
MWC Organics	NSPS	3.5x10 ⁻⁶	NM
MWC Metals	NSPS	15	NM
MWC Acid Gases	NSPS	40	NM
MSW Landfill Gases	NSPS	50	NM

Note: Ambient monitoring requirements for any pollutant may be exempted if the impact of the increase in emissions is below *de minimis* monitoring concentrations.

NAAQS = National Ambient Air Quality Standards.

NM = No ambient measurement method established; therefore, no *de minimis* concentration has been established.

NSPS = New Source Performance Standards.

NESHAP = National Emission Standards for Hazardous Air Pollutants.

g/m³ = micrograms per cubic meter.

MWC = Municipal waste combustor

MSW = Municipal solid waste

^a Short-term concentrations are not to be exceeded.

^b No *de minimis* concentration; an increase in VOC emissions of 100 TPY or more will require monitoring analysis for ozone.

^c Any emission rate of these pollutants.

Sources: 40 CFR 52.21.

Rule 62-212.400

Table 3-2. Maximum Emissions Due to the Proposed Finish Spray Line Compared to the PSD Significant Emission Rates

Pollutant	Pollutant Emissions (TPY)		PSD Review
	Potential Emissions from Proposed Facility	Significant Emission Rate	
Volatile Organic Compounds	130.5	40	Yes
Particulate Matter [PM (TSP)]	4.66	25	No
Particulate Matter (PM ₁₀)	4.66	15	No
Nitrogen Dioxide	0.40	40	No
Carbon Monoxide	0.12	100	No
Sulfur Dioxide	0.00086	40	No

Note: NEG = Negligible.

4.0 AMBIENT MONITORING ANALYSIS

4.1 INTRODUCTION

In accordance with requirements of 40 CFR 52.21(m) and Rule 62-212.400(5)(f), F.A.C., any application for a PSD permit must contain an analysis of continuous ambient air quality data in the area affected by the proposed major stationary facility or major modification. For a new major facility, the affected pollutants are those that the facility potentially would emit in significant amounts. For a major modification, the pollutants are those for which the net emissions increase exceeds the significant emission rate.

Ambient air monitoring for a period of up to 1 year is generally appropriate to satisfy the PSD monitoring requirements. A minimum of 4 months of data is required. Existing data from the vicinity of the proposed source may be used if the data meet certain quality assurance requirements; otherwise, additional data may need to be gathered. Guidance in designing a PSD monitoring network is provided in EPA's *Ambient Monitoring Guidelines for Prevention of Significant Deterioration* (EPA, 1987).

An exemption from the preconstruction ambient monitoring requirements is also available if certain criteria are met. If the predicted increase in ambient concentrations due to the proposed modification is less than the specified *de minimis* concentration for a particulate pollutant, the modification can be exempted from the preconstruction air monitoring requirements for that pollutant.

As described in Section 3.5.2, a preconstruction air monitoring analysis is required for ozone. This analysis is presented in the following section. In addition, existing ambient air quality data for the Everglades National Park Class I area, is presented to support the AQRV analysis presented in Section 6.0.

The existing air quality data in Dade County is sufficient to satisfy the pre-construction monitoring requirements for ozone, therefore Nailite requests an exemption from pre-construction monitoring. Since ozone is a regional pollutant, existing data collected at the

monitoring stations in Dade County will measure trends and compliance with ambient standards for the county.

4.2 AMBIENT OZONE CONCENTRATIONS

The PSD ambient monitoring guidelines allow the use of existing data to satisfy preconstruction review requirements and to develop background concentrations. Presented in Table 4-1 is a summary of existing continuous ambient ozone data for monitors located in the vicinity of Miami. Data are presented for the last 2 years of record, 1998 to 1999. The ozone monitors show that ambient ozone concentrations were within the ambient air quality standards of: 0.12 ppm, maximum 1-hour average allowed to be exceeded on average one day per year; and 0.08 ppm, average annual fourth highest 8-hour average.

Table 4-1. Summary of Ozone Ambient Monitoring Data from Miami

Year	County	Station ID	Monitor Location	Number of Observations	Concentration (ppm)		
					Maximum 1-Hour	2nd-High 1-Hour	3rd-High 1-Hour
1998	Dade	12-025-0021	Krome Ave.	337	0.12	0.11	0.11
1999	Dade	12-025-0021	Krome Ave.	170	0.10	0.10	0.09
1998	Dade	12-025-0027	Rosenstiel School	336	0.11	0.09	0.09
1999	Dade	12-025-0027	Rosenstiel School	173	0.09	0.08	0.08
1998	Dade	12-025-0029	19590 Old Cutler	343	0.11	0.10	0.10
1999	Dade	12-025-0029	19591 Old Cutler	179	0.09	0.09	0.08

4-3

Note: ppm = parts per million.

5.0 CONTROL TECHNOLOGY REVIEW

5.1 APPLICABILITY

The PSD regulations require new major stationary sources to undergo a control technology review for each pollutant that may potentially be emitted in amounts that are greater than the PSD significant emission rates shown in Table 3-1. In this case, the control technology review requirements of the PSD regulations are applicable to emissions of VOC (see Section 3.0). The maximum potential VOC emissions from the proposed panel finishing spray line and the emissions from the control device are 130.5 TPY, of which 90.0 TPY are due to fugitive emissions and 40.5 TPY from the RTO control device.

This section presents the proposed BACT for VOC. The approach to the BACT analysis is based on the regulatory definitions of BACT, as well as EPA's current policy guidelines requiring a top-down approach. A BACT determination requires an analysis of the economic, environmental, and energy impacts of the proposed and alternative control technologies [see 40 CFR 52.21(b)(12); and Rule 62-210.200(42), and Rule 62-214.410, F.A.C.]. The analysis must, by definition, be specific to the project (i.e., case-by-case).

In addition to BACT, a case-by-case MACT determination is required for HAPs emission because EPA has not yet promulgated a MACT standard applicable to Nailite.

5.2 MAXIMUM AVAILABLE CONTROL TECHNOLOGY

VOCs and HAPs will be emitted by the panel spray finishing line as a result of the coating operations. Based on review of available information, the applicant is proposing a RTO to control VOC/HAP emissions. The proposed MACT for VOC/HAP emissions will be the use of a RTO to control the VOC/HAP emissions from the spray booths and curing oven by 95 percent. Considering fugitive VOC/HAP emissions, the overall control efficiency is 86 percent.

The proposed MACT exceeds the 76 percent reduction required by a similar MACT evaluation for Ball Metal Container, a can coating operation in Hillsborough County. The proposed MACT also provides the maximum degree of control of HAP emissions. Since an RTO represents the

control technology capable of the maximum emission reduction for this proposed spray line, no other control technologies were evaluated.

5.3 BEST AVAILABLE CONTROL TECHNOLOGY

Since by definition MACT exceeds BACT requirements, the proposed RTO also satisfies BACT for the proposed project.

6.0 ADDITIONAL IMPACT ANALYSIS

The additional impact analysis addresses the potential ozone concentrations due to the VOC emissions of the new paint line on vegetation, soils, and wildlife on the surrounding area and PSD Class I areas. The nearest Class I area to the facility is the Everglades National Park located approximately 35 km south of the project site. Facilities whose pollutant emissions are subject to the PSD regulations are required to evaluate the additional impacts associated with the proposed emissions for the project.

Ozone is not emitted directly into the atmosphere but is formed from the emissions of several pollutants including VOC. The formation of ozone occurs over large distances (several hundred miles) and is considered to be a regional pollutant. Because of the extensive data requirements needed in estimating ozone concentrations, air dispersion modeling is not typically performed in evaluating the potential impact of VOC emissions from a single project on ozone formation in a region. Rather, the project's potential impact can be evaluated by comparing the project's VOC emissions to those of the county or region in which the project is located.

The proposed new paint line has the potential to emit 130.5 TPY of VOC after emission controls. These potential VOC emissions represent 0.2 percent of the 59,800 TPY of VOC emissions estimated for Palm Beach County for 1996 by the EPA. In the region consisting of Palm Beach, Broward, and Dade Counties, the project's emissions represent less than 0.1 percent of the 228,000 TPY estimated for these counties. The VOC emissions for these counties were obtained from EPA's National Emission Trends (NET) database available through the Aerometric Information Retrieval System (AIRS) on EPA's Technology Transfer Network (TTN) internet site.

Because the project's emissions represent a minimal change in VOC emissions for Palm Beach County and the region, the project's impacts on ozone concentrations are anticipated to be negligible. As a result, the project's impacts to soil, vegetation and wildlife on the surrounding area and PSD Class I areas are also expected to be minimal.

APPENDIX A

MSDS SHEETS

MATERIAL SAFETY DATA SHEET

FOR COATINGS, RESINS AND RELATED MATERIALS

Date of Prep |
3/12/99 |

SECTION I

Manufacturer's Name: STRATHMORE PRODUCTS INC
Address: 1970 WEST FAYETTE STREET
City, State and Zip Code: SYRACUSE, NEW YORK 13201

Emergency Telephone Nos. Day: 315/488-5401
Night: For Health - Poison Control Center 315/476-4766
For Spills - Chem-Tel 1-800/255-3924

Manufacturers Code Identification: B35-0082 Rev. 12/05/96
Product Class: ACRYLIC COATING
Trade Name: PLASTICEL BLACK COATING

SECTION II - HAZARDOUS INGREDIENTS

Ingredient Material Description	CAS Number	% By Weight	TLV ACGIH	PEL OSHA	Units	LEL %	VP MM HG	Comment
TOLUENE	108-88-3	68.96	50.0000	200.0000	PPM	1.20	38.00	
XYLENE	1330-20-7	1.50	100.0000	100.0000	PPM	1.00	9.50	
CARBON BLACK	1333-86-4		3.5000	3.5000	MG/M3	N.EST	N.EST	
*S MSDS Section X AMORPHOUS SILICA	61790-53-2		10.0000	6.0000	MG/M3	N.EST	N.EST	
#S A Sec.313 Supplier Notif. See MSDS Section X								

SECTION III - PHYSICAL DATA

Boiling Range: 230 - 284 DEG F | Weight per Gallon: 7.99
Vapor Density: Heavier than Air | % Volatile by Volume: 77.67
Evaporation Rate: Slower than Ether

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

DOT Category: RED LABEL, FLAMMABLE LESS THAN 100 DEG F
Flash Point: 46 DEG F SETA Flash | LEL: See SECTION II

EXTINGUISHING MEDIA: FOAM, DRY CHEMICAL OR CARBON DIOXIDE EXTINGUISHERS.

UNUSUAL FIRE AND EXPLOSION HAZARDS: KEEP CONTAINERS TIGHTLY CLOSED.
ISOLATE FROM HEAT, SPARKS, ELECTRICAL EQUIPMENT AND OPEN FLAME. CLOSED
CONTAINERS MAY EXPLODE OR RUPTURE WHEN EXPOSED TO EXTREME HEAT. DO NOT
APPLY TO HOT SURFACES. AVOID BREATHING GASES, VAPORS, FUMES OR
DECOMPOSITION PRODUCTS DURING A FIRE. OVEREXPOSURE TO DECOMPOSITION
PRODUCTS MAY CAUSE A HEALTH HAZARD. SYMPTOMS MAY NOT BE IMMEDIATELY

APPARENT. OBTAIN MEDICAL ATTENTION.

SPECIAL FIREFIGHTING PROCEDURES: KEEP CONTAINERS TIGHTLY CLOSED. -ISOLATE FROM HEAT, SPARKS, ELECTRICAL EQUIPMENT AND OPEN FLAME. AVOID BREATHING GASES, VAPORS, FUMES OR DECOMPOSITION PRODUCTS DURING A FIRE. PERSONNEL INVOLVED IN A FIRE SHOULD WEAR FULL PROTECTIVE EQUIPMENT, INCLUDING SELF-CONTAINED RESPIRATORY EQUIPMENT. WATER SPRAY MAY BE USED TO COOL UNRUPTURED CLOSED CONTAINERS TO PREVENT PRESSURE BUILD-UP AND POSSIBLE AUTO-IGNITION OR EXPLOSION WHEN EXPOSED TO EXTREME HEAT. IF WATER IS USED, FOG NOZZLES ARE PREFERABLE.

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: SEE SECTION II

EFFECTS OF ACUTE (SHORT TERM) OVEREXPOSURE:
INHALATION OF VAPORS OR SPRAY MISTS CAN CAUSE IRRITATION OF THE RESPIRATORY TRACT OR ACUTE NERVOUS SYSTEM DEPRESSION CHARACTERIZED BY HEADACHE, DIZZINESS, STAGGERING GAIT, CONFUSION, UNCONSCIOUSNESS OR COMA. OVEREXPOSURE TO VAPORS OR SPRAY MISTS CAN CAUSE EYE AND SKIN IRRITATION.

EYE CONTACT WITH LIQUID MAY CAUSE SEVERE IRRITATION.

SKIN CONTACT: BRIEF CONTACT WITH SKIN MAY CAUSE SLIGHT TO MODERATE IRRITATION AND POSSIBLY DRYING OF THE SKIN.

INGESTION: MAY BE HARMFUL IF SWALLOWED. SWALLOWING MAY CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, DIARRHEA, VOMITING, AND POSSIBLY NARCOSIS. ASPIRATION OF MATERIAL INTO THE LUNGS CAN CAUSE PNEUMONITIS, WHICH CAN BE FATAL.

EFFECTS OF CHRONIC (LONG TERM) OCCUPATIONAL OVEREXPOSURE:
REPEATED OR PROLONGED OCCUPATIONAL OVEREXPOSURE TO VAPORS MAY AFFECT THE CENTRAL NERVOUS SYSTEM AND CAUSE RESPIRATORY IRRITATION, RESULTING IN POSSIBLE LUNG DAMAGE, AND MAY CAUSE LIVER AND KIDNEY DAMAGE.

NOTE: A CASE EFFECT SHOWED ACTIVE LIVER & KIDNEY DYSFUNCTION AT EXTREMELY HIGH LEVELS OF EXPOSURE TO XYLENE AND TOLUENE.

NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL.

REPEATED OR PROLONGED SKIN CONTACT MAY CAUSE DRYING AND DEFATTING OF THE SKIN, WHICH MAY LEAD TO DERMATITIS.

CARCINOGENICITY: THIS MATERIAL CONTAINS CARBON BLACK. EPIDEMIOLOGICAL STUDIES OF WORKERS IN THE CARBON BLACK PRODUCING INDUSTRIES OF NORTH AMERICA AND WESTERN EUROPE SHOW NO EVIDENCE OF CLINICALLY SIGNIFICANT ADVERSE HEALTH EFFECTS DUE TO OCCUPATIONAL EXPOSURE TO CARBON BLACK. IN ITS MONOGRAM VOLUME 65, ISSUED APRIL, 1996, THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER (IARC) REEVALUATED CARBON BLACK AND CONCLUDED THAT "THERE IS INADEQUATE EVIDENCE IN HUMANS FOR THE CARCINOGENICITY OF CARBON

BLACK".

CARBON BLACKS SUPPLIED BY OUR DOMESTIC SUPPLIERS CONTAIN LESS THAN 0.1% OF ADSORBED PAH'S (POLYNUCLEAR AROMATIC HYDROCARBONS). IN NON-ADSORBED FORM, SOME PAH'S HAVE BEEN FOUND TO BE CARCINOGENS IN ANIMAL STUDIES. NO CARCINOGENIC EFFECT, HOWEVER, HAS BEEN OBSERVED IN HUMANS DUE TO CARBON BLACK. CHRONIC INFLAMMATION, LUNG FIBROSIS AND LUNG TUMORS HAVE BEEN OBSERVED IN SOME RATS EXPERIMENTALLY EXPOSED, FOR LONG PERIODS OF TIME, TO EXCESSIVE CONCENTRATIONS OF CARBON BLACK AND SEVERAL OTHER INSOLUBLE FINE DUST PARTICLES. TUMORS HAVE NOT BEEN OBSERVED IN OTHER ANIMAL SPECIES (I.E., MOUSE AND HAMSTER) UNDER SIMILAR CIRCUMSTANCES & STUDY CONDITIONS. MANY RESEARCHERS CONDUCTING RAT INHALATION STUDIES BELIEVE THAT THESE EFFECTS MOST LIKELY RESULT FROM THE MASSIVE ACCUMULATION OF SMALL DUST PARTICLES IN THE LUNG WHICH OVERWHELM THE NATURAL LUNG CLEARANCE MECHANISMS, KNOWN AS "LUNG OVERLOAD" PHENOMENON, RATHER THAN FROM A SPECIFIC CHEMICAL EFFECT OF THE DUST PARTICLES IN THE LUNG.

MANY INHALATION TOXICOLOGISTS BELIEVE THAT THE TUMOR RESPONSE OBSERVED IN THE REFERENCED RAT STUDIES IS SPECIES SPECIFIC AND DOES NOT RELATE TO HUMAN EXPOSURE. HOWEVER, THE IARC EVALUATION IN MONOGRAPH 65 CONCLUDED THAT "THERE IS SUFFICIENT EVIDENCE IN EXPERIMENTAL ANIMALS FOR THE CARCINOGENICITY OF CARBON BLACK". BASED ON THIS EVALUATION, ALONG WITH THEIR EVALUATION OF INADEQUATE CARCINOGENICITY IN HUMANS, IARC'S OVERALL EVALUATION IS THAT "CARBON BLACK IS POSSIBLY CARCINOGENIC TO HUMANS (GROUP 2B)".

CARBON BLACK HAS NOT BEEN LISTED AS A CARCINOGEN BY NTP (NATIONAL TOXICOLOGY PROGRAM) OR OSHA (OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION). NIOSH (NATIONAL INSTITUTE OF SAFETY & HEALTH) CRITERIA DOCUMENT ON CARBON BLACK RECOMMENDS THAT ONLY CARBON BLACKS WITH PAH LEVELS GREATER THAN 0.1% BE CONSIDERED SUSPECT CARCINOGENS.

EMERGENCY AND FIRST AID PROCEDURES: INHALATION: REMOVE TO FRESH AIR. IF BREATHING HAS STOPPED, GIVE MOUTH-TO-MOUTH RESUSCITATION AND KEEP WARM AND QUIET. IF BREATHING IS DIFFICULT, GIVE OXYGEN. GET MEDICAL HELP IMMEDIATELY. SPLASH (EYES): FLUSH IMMEDIATELY WITH COPIOUS QUANTITIES OF WATER FOR 15 MINUTES AND TAKE TO A PHYSICIAN FOR DEFINITIVE MEDICAL TREATMENT. SPLASH (SKIN): REMOVE CONTAMINATED CLOTHING AND WASH AFFECTED AREA WITH SOAP AND WATER. IF IRRITATION PERSISTS, SEE A PHYSICIAN.

WARNING: IF SWALLOWED, DO NOT INDUCE VOMITING. CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY OVEREXPOSURE:
EXPOSURE MAY AGGRAVATE PREEXISTING SKIN, EYE AND RESPIRATORY DISORDERS.

SECTION VI - REACTIVITY DATA

STABILITY: STABLE

CONDITIONS TO AVOID: EXCESSIVE HEAT, SPARKS, OPEN FLAME.

INCOMPATIBILITY (MATERIALS TO AVOID): AVOID STRONG OXIDIZING AGENTS, STRONG ACIDS, STRONG ALKALINE MATERIALS AND BASES.

HAZARDOUS DECOMPOSITION PRODUCTS: SMOKE, ACRID FUMES, CARBON DIOXIDE AND/OR CARBON MONOXIDE, HYDROGEN CHLORIDE, AND POSSIBLY OTHER TOXIC

VAPORS.

-HAZARDOUS POLYMERIZATION: WILL NOT OCCUR.

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: REMOVE ALL SOURCES OF IGNITION (FLAMES, HOT SURFACES AND ELECTRICAL, STATIC OR FRICTION SPARKS). AVOID BREATHING VAPORS. WEAR APPROPRIATE PROTECTIVE EQUIPMENT. VENTILATE AREA. ADD INERT ABSORBENT AND REMOVE TO APPROPRIATE CONTAINER FOR DISPOSAL WITH NON-SPARKING TOOLS. KEEP OUT OF SEWERS, STORM DRAINS, SURFACE WATER AND SOIL.

WASTE DISPOSAL METHOD: DISPOSE IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS. INCINERATE IN APPROVED FACILITY. DO NOT INCINERATE CLOSED CONTAINERS.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: FOR MATERIALS THAT CAN BE APPLIED BY BRUSH OR ROLLERCOAT, NO RESPIRATORY EQUIPMENT MAY BE NECESSARY IN OUTDOOR OR OPEN AREAS WITH UNRESTRICTED VENTILATION, WHERE THE TLV'S DO NOT EXCEED THOSE SHOWN IN SECTION II.

FOR MATERIALS THAT ARE APPLIED BY SPRAY - IN OUTDOOR OR OPEN AREAS WITH UNRESTRICTED VENTILATION, USE NIOSH APPROVED MECHANICAL FILTER RESPIRATORS DESIGNED TO REMOVE SOLID AIRBORNE PARTICLES OF OVERSPRAY DURING SPRAY APPLICATION. IN RESTRICTED VENTILATION AREAS, USE NIOSH APPROVED CHEMICAL/MECHANICAL FILTERS DESIGNED TO REMOVE A COMBINATION OF PARTICULATES AND VAPOR. IN CONFINED AREAS USE NIOSH AIRLINE TYPE RESPIRATORS OR HOODS.

VENTILATION: PROVIDE GENERAL DILUTION OR LOCAL EXHAUST VENTILATION IN VOLUME AND PATTERN TO KEEP TLV OF MOST HAZARDOUS INGREDIENT IN SECTION II BELOW ACCEPTABLE LIMIT, LEL IN SECTION IV BELOW STATED LIMIT, AND TO REMOVE DECOMPOSITION PRODUCTS DURING WELDING OR FLAME CUTTING ON SURFACES COATED WITH THIS PRODUCT.

PROTECTIVE GLOVES: SOLVENT RESISTANT GLOVES ARE REQUIRED FOR PROLONGED OR REPEATED CONTACT WITH LIQUID.

EYE PROTECTION: IN SPLASH SITUATIONS, SUCH AS TRANSFER OF LIQUIDS, THE USE OF SAFETY EYEWEAR INCLUDING SPLASH GUARDS OR SIDE SHIELDS, CHEMICAL GOGGLES OR FACE SHIELDS IS RECOMMENDED.

OTHER PROTECTIVE EQUIPMENT: WEAR APPROPRIATE PROTECTIVE OUTERWEAR TO PROTECT AGAINST CLOTHING CONTAMINATION AND PROLONGED SKIN CONTACT. WHEN NECESSARY, WEAR CHEMICAL AND/OR SOLVENT RESISTANT BOOTS TO PROTECT FEET AND SHOES FROM CONTAMINATION. REMOVE AND WASH CONTAMINATED CLOTHING BEFORE REUSE. DISCARD CONTAMINATED SHOES THAT CANNOT BE THOROUGHLY CLEANED BEFORE REUSE. WASH HANDS BEFORE EATING, SMOKING OR USING RESTROOM.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: DO NOT STORE ABOVE 120 DEG F. DO NOT STORE OR USE NEAR HEAT, SPARKS OR OPEN FLAME. KEEP CONTAINERS TIGHTLY COVERED AND UPRIGHT TO PREVENT LEAKAGE. STORE LARGE QUANTITIES IN BUILDINGS DESIGNED AND PROTECTED FOR STORAGE OF NFPA CLASS 1B FLAMMABLE LIQUIDS.

OTHER PRECAUTIONS: WARNING - FLAMMABLE. KEEP AWAY FROM HEAT, SPARKS AND OPEN FLAME. VAPORS MAY CAUSE FLASH FIRE. CONTAINERS SHOULD BE GROUNDED WHEN POURING TO AVOID STATIC CHARGE BUILDUP WHICH CAN CAUSE A FLASH FIRE. VAPORS HARMFUL. MAY CAUSE IRRITATION TO EYES, NOSE, THROAT, SKIN AND RESPIRATORY TRACT. PROLONGED OR REPEATED CONTACT OF LIQUID, OR BREATHING OF VAPORS OR MISTS, MAY CAUSE DELAYED AND SERIOUS INJURY. USE ONLY WITH ADEQUATE VENTILATION. AVOID BREATHING VAPORS OR SPRAY MIST. AVOID CONTACT WITH EYES AND SKIN. DO NOT TAKE INTERNALLY. DO NOT SAND, FLAME CUT, BRAZE OR WELD DRY COATING WITHOUT A NIOSH APPROVED RESPIRATOR OR SUFFICIENT VENTILATION. NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING CONTENTS MAY BE HARMFUL OR FATAL.

MISCELLANEOUS PRECAUTIONS: WARNING - EMPTY CONTAINERS MAY CONTAIN PRODUCT RESIDUE, INCLUDING FLAMMABLE OR EXPLOSIVE VAPORS. DO NOT CUT, PUNCTURE OR WELD ON OR NEAR CONTAINER. ALL LABEL WARNINGS MUST BE OBSERVED UNTIL THE CONTAINER HAS BEEN CLEANED OR RECONDITIONED.

SECTION X - MISCELLANEOUS

*FOOTNOTES TO SECTION II:

THE PIGMENTS FOLLOWING THE * IN SECTION II ARE CONSIDERED NUISANCE DUSTS IN THEIR DRY FORM.

#SECTION 313 SUPPLIER NOTIFICATION: THE ITEMS SHOWN IN SECTION II OF THIS MSDS THAT ARE PRECEDED WITH # ARE TOXIC CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF THE EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT OF 1986 AND OF 40 CFR 372.

ALSO, ITEMS IN SECTION II PRECEDED BY AN @ CONTAIN COMPONENTS WHICH ARE SUBJECT TO REPORTING REQUIREMENTS UNDER SARA 313 AND ARE EXPLAINED BELOW.

@ THIS PRODUCT CONTAINS XYLENE, WHICH CONTAINS THE FOLLOWING COMPONENTS REPORTABLE UNDER SARA 313:

83% XYLENE, CAS# 1330-20-7

17% ETHYL BENZENE, CAS# 100-41-4

USER'S RESPONSIBILITY: THE RESPONSIBILITY TO PROVIDE A SAFE WORKPLACE REMAINS WITH THE USER. THE USER SHOULD CONSIDER THE HEALTH HAZARDS AND SAFETY INFORMATION CONTAINED HEREIN AS A GUIDE AND SHOULD TAKE THOSE PRECAUTIONS REQUIRED IN AN INDIVIDUAL OPERATION TO INSTRUCT EMPLOYEES AND DEVELOP WORK PRACTICE PROCEDURES FOR A SAFE WORK ENVIRONMENT. IT IS THE RESPONSIBILITY OF THE USER TO COMPLY WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL LAWS AND REGULATIONS.

TO THE BEST OF OUR KNOWLEDGE, THE INFORMATION CONTAINED HEREIN IS ACCURATE. HOWEVER, STRATHMORE PRODUCTS, INC., ASSUMES NO LIABILITY WHATSOEVER FOR THE ACCURACY, RELIABILITY OR COMPLETENESS OF THE

INFORMATION CONTAINED HEREIN. FINAL DETERMINATION OF SUITABILITY OF ANY MATERIAL IS THE SOLE RESPONSIBILITY OF THE USER. SINCE THE CONDITIONS OF HANDLING AND USE ARE BEYOND OUR CONTROL, WE MAKE NO GUARANTEE OF RESULTS, AND ASSUME NO LIABILITY FOR DAMAGES INCURRED BY USE OF THIS MATERIAL. ALL MATERIALS MAY PRESENT UNKNOWN HEALTH AND SAFETY HAZARDS AND SHOULD BE USED WITH CAUTION. ALTHOUGH CERTAIN HAZARDS ARE DESCRIBED HEREIN, WE CANNOT GUARANTEE THAT THESE ARE THE ONLY HAZARDS WHICH EXIST.

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:

Benny Susi, P.E.
 Golder Associates, Inc.
 6241 NW 23rd Street, Suite 500
 Gainesville, FL 32653

2. Article Number (Copy from service label)

7000 2870 0000 7028 2874

PS Form 3811, July 1999

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

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

Rick Stransky 10-29-01

C. Signature Agent Addressee
X *Rick Stransky*

D. Is delivery address different from item 1? Yes
If YES, enter delivery address

3. Service Type
 Certified Mail Exp
 Registered Reti
 Insured Mail C.O

4. Restricted Delivery? (Extra)

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

OFFICIAL USE

7000 2870 0000 7028 2874

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

Postmark Here

Sent To

Benny Susi, P.E.

Street, Apt. No., or PO Box No.

6241 NW 23rd St., Suite 500

City, State, ZIP+4

Gainesville, FL 32653

PS Form 3800, May 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Mr. David G. Steedman
 Vice President of Operations
 Nailite International, Inc.
 1111 NW 165th Street
 Miami, FL 33169

2. Article Number (Copy from service label)

7000 2870 0000 7028 2881

PS Form 3811, July 1999

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

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

Kim Pacheco 10/29

C. Signature Agent Addressee
X *Kim Pacheco*

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

3. Service Type
 Certified Mail Express Mail
 Registered
 Insured Mail

4. Restricted Delivery

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

OFFICIAL USE

7000 2870 0000 7028 2881

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

Postmark Here

Sent To

David G. Steedman

Street, Apt. No., or PO Box No.

1111 NW 165th Street

City, State, ZIP+4

Miami, FL 33169

PS Form 3800, May 2000

See Reverse for Instructions

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>SC</i>	B. Date of Delivery <i>10/12/01</i>
1. Article Addressed to: Mr. Benny Susi, P.E. Golder Associates, Inc. 6241 NW 23 Street Gainesville, FL 32553-1500	C. Signature <i>*M. Susi</i> <div style="float: right;"> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee </div>	
2. Article Number (Copy from service label) 7000 2870 0000 7028 2546	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
PS Form 3811, July 1999	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
Domestic Return Receipt	102595-99-M-1789	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)											
7000 2870 0000 7028 2546	Mr. Benny Susi, P.E.										
<table border="1"> <tr> <td>Postage</td> <td>\$</td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> </tr> </table>	Postage	\$	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		Total Postage & Fees	\$	Postmark Here
Postage	\$										
Certified Fee											
Return Receipt Fee (Endorsement Required)											
Restricted Delivery Fee (Endorsement Required)											
Total Postage & Fees	\$										
<table border="1"> <tr> <td>Sent To</td> <td>Golder Associates</td> </tr> <tr> <td>Street, Apt. No., or PO Box No.</td> <td>6241 NW 23 St.</td> </tr> <tr> <td>City, State, ZIP+4</td> <td>Gainesville, FL 32653-1500</td> </tr> </table>		Sent To	Golder Associates	Street, Apt. No., or PO Box No.	6241 NW 23 St.	City, State, ZIP+4	Gainesville, FL 32653-1500				
Sent To	Golder Associates										
Street, Apt. No., or PO Box No.	6241 NW 23 St.										
City, State, ZIP+4	Gainesville, FL 32653-1500										
PS Form 3800, May 2000 See Reverse for Instructions											

2

Z 341 355 305

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to David Steedman	
Street & Number Nailite Internat'l	
Post Office, State, & ZIP Code Miami	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	6-2-00
0250407-003AC	
PSO-FI-289	

PS Form 3800 April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. David Steedman
Vice President of Operations
Nailite International
1111 NW 165th St.
Miami, FL 33169

4a. Article Number
Z 341 355 305

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
6/5

5. Received By: (Print Name)
SUE AMDUR

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
X Sue Amdur

Thank you for using Return Receipt Service.

Z 341 355 298

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>David Steedman</i>	
Street & Number <i>Mailite Internat'l</i>	
Post Office, State, & ZIP Code <i>Miami FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>5-26-00</i>	
<i>0350407-003-AC</i>	
<i>050-FL-289</i>	

PS Form 3800, April 1995

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 _____</p> <p>C. Signature <input checked="" type="checkbox"/> <i>J. Abell</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to: <i>Mr. David Steedman</i> <i>Vice President of Operations</i> <i>Mailite Internat'l, Inc</i> <i>1111 NW 165th St.</i> <i>Miami, FL 33169</i></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>

Article Number (Copy from service label)

Z 341 355 298

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

929T
 E54T
 0000
 004E
 69D7

Article Sent To:
David Steedman

Postage	\$	<i>Nailite</i> Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)
David S. Steedman
 Street, Apt. No. or PO Box No.
1111 NW 165 St
 City, State, ZIP+4
Miami, FL 33169

PS Form 3800, July 1999 See Reverse for Instructions

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 <i>9/28</i></p> <p>C. Signature <input type="checkbox"/> Agent X <i>O. Rivera</i> <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p style="text-align: center;">Mr. David G. Steedman Nailite International, Inc. 1111 NW 165 St Miami, FL 33169</p>	<p>3. Service Type</p> <p><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>2. Article Number (Copy from service label) <i>7099340000014531828</i></p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

FedEx USA Airbill

FedEx Tracking Number

806095050244

Form I.D. No.

0210

SOR13 Sender's Copy

1 From (please print and press hard)
Date 8-4-00 Sender's FedEx Account Number 1043-1506-2

Sender's Name Al Lineco Phone (850) 921-9523

Company DEPT OF ENVIR PROTECTION-MS

Address 2600 BLAIR STONE RD Dept./Floor/Suite/Room

City TALLAHASSEE State FL ZIP 32399

2 Your Internal Billing Reference Information
(Optional) (First 24 characters will appear on invoice)

3 To (please print and press hard)
Recipient's Name Benny Susi Phone (561) 994-9910

Company Golder Associates, Inc.

Address 1801 Clint Moore Rd, Suite 105 (To "HOLD" at FedEx location, print FedEx address here) (We Cannot Deliver to P.O. Boxes or P.O. ZIP Codes) Dept./Floor/Suite/Room

City Boca Raton State FL ZIP 33487

For HOLD at FedEx Location check here
 Hold Weekday (Not available with FedEx First Overnight) Hold Saturday (Available for FedEx Priority Overnight and FedEx 2Day only) (Not available at all locations)
For WEEKEND Delivery check here (Extra Charge, Not available to all locations)
 Saturday Delivery (Available for FedEx Priority Overnight and FedEx 2Day only) NEW Sunday Delivery (Available for FedEx Priority Overnight only)

Service Conditions, Declared Value, and Limit of Liability - By using this Airbill, you agree to the service conditions in our current Service Guide or U.S. Government Service Guide. Both are available on request. SEE BACK OF SENDER'S COPY OF THIS AIRBILL FOR INFORMATION AND ADDITIONAL TERMS. We will not be responsible for any claim in excess of \$100 per package whether the result of loss, damage, or delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, and document your

actual loss in a timely manner. Your right to recover from us for any loss includes intrinsic value of the package, loss of sales, interest, profit, attorney's fees, costs, and other forms of damage, whether direct, incidental, consequential, or special, and is limited to the greater of \$100 or the declared value but cannot exceed actual documented loss. The maximum declared value for any FedEx Letter and FedEx Pak is \$500. Federal Express may, upon your request, and with some limitations, refund all transportation charges paid. See the FedEx Service Guide for further details.

Questions?
Call 1-800-Go-FedEx® (800)463-3339

The World On Time.

005500864 0

4a Express Package Service Packages under 150 lbs. Delivery commitment may be later in some areas.
 FedEx Priority Overnight (Next business morning) FedEx Standard Overnight (Next business afternoon)
 FedEx First Overnight (Earliest next business morning delivery to select locations) (Higher rates apply)
 FedEx 2Day (Second business day) FedEx Express Saver (Third business day)
FedEx Letter Rate not available. Minimum charge: One pound rate.

4b Express Freight Service Packages over 150 lbs. Delivery commitment may be later in some areas.
 FedEx Overnight Freight (Next business day) FedEx 2Day Freight (Second business day) FedEx Express Saver Freight (Up to 3 business days)
(Call for delivery schedule. See back for detailed descriptions of freight services.)

5 Packaging FedEx Letter (Declared value limit \$500) FedEx Pak FedEx Box FedEx Tube Other Pkg.

6 Special Handling (One box must be checked)
Does this shipment contain dangerous goods? No Yes (As per attached Shipper's Declaration) Yes (Shipper's Declaration not required)
 Dry Ice Cargo Aircraft Only
Dry Ice, 9, UN 1845 x kg. *Dangerous Goods cannot be shipped in FedEx packaging.

7 Payment
Bill to: Sender (Account No. in Section 1 will be billed) Recipient (Enter FedEx Account No. or Credit Card No. below) Third Party Credit Card Cash/Check

FedEx Account No. 1009 4439 4
Credit Card No. Exp. Date

Total Packages	Total Weight	Total Declared Value*	Total Charges
		\$.00	\$

*When declaring a value higher than \$100 per shipment, you pay an additional charge. See SERVICE CONDITIONS, DECLARED VALUE, AND LIMIT OF LIABILITY section for further information.

8 Release Signature Sign to authorize delivery without obtaining signature.

Your signature authorizes Federal Express to deliver this shipment without obtaining a signature and agrees to indemnify and hold harmless Federal Express from any resulting claims.

321

WCSL 0398
Rev. Date 12/97
Part #153023
©1994-97 FedEx
PRINTED IN U.S.A.

RETAIN THIS COPY FOR YOUR RECORDS

FedEx USA Airbill

FedEx Tracking Number

806095050255

Form I.D. No.

0210

SOR 13
Sender's Copy

1 From (please print and press hard)

Date 8-4-00 Sender's FedEx Account Number 1043 1506 2

Sender's Name AL Linero Phone (850) 921-9523

Company DEPT OF ENVIR PROTECTION-MS

Address 2600 BLAIR STONE RD Dept./Floor/Suite/Room

City TALLAHASSEE State FL ZIP 32399

2 Your Internal Billing Reference Information
(Optional) (First 24 characters will appear on invoice)

3 To (please print and press hard)

Recipient's Name Mr. David G. Steedman Phone (305) 620-6200

Company Nailite International, Inc.

Address 1111 NW 165th Street Dept./Floor/Suite/Room
(To "HOLD" at FedEx location, print FedEx address here) (We Cannot Deliver to P.O. Boxes or P.O. ZIP Codes)

City Miami State FL ZIP 33169

For HOLD at FedEx Location check here

Hold Weekday (Not available with FedEx First Overnight)
 Hold Saturday (Not available at all locations) (Available for FedEx Priority Overnight and FedEx 2Day only)

For WEEKEND Delivery check here

Saturday Delivery (Available for FedEx Priority Overnight and FedEx 2Day only)
 NEW Sunday Delivery (Available for FedEx Priority Overnight only)

Service Conditions, Declared Value, and Limit of Liability - By using this Airbill, you agree to the service conditions in our current Service Guide or U.S. Government Service Guide. Both are available on request. SEE BACK OF SENDER'S COPY OF THIS AIRBILL FOR INFORMATION AND ADDITIONAL TERMS. We will not be responsible for any claim in excess of \$100 per package whether the result of loss, damage, or delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, and document your

actual loss in a timely manner. Your right to recover from us for any loss includes intrinsic value of the package, loss of sales, interest, profit, attorney's fees, costs, and other forms of damage, whether direct, incidental, consequential, or special, and is limited to the greater of \$100 or the declared value but cannot exceed actual documented loss. The maximum declared value for any FedEx Letter and FedEx Pak is \$500. Federal Express may, upon your request, and with some limitations, refund all transportation charges paid. See the FedEx Service Guide for further details.

Questions?

Call 1-800-Go-FedEx® (800)463-3339

The World On Time.

005500864 0

4a Express Package Service Packages under 150 lbs.

Delivery commitment may be later in some areas.

FedEx Priority Overnight (Next business morning) FedEx Standard Overnight (Next business afternoon)
 FedEx First Overnight (Earliest next business morning delivery to select locations) (Higher rates apply)
 FedEx 2Day (Second business day) FedEx Express Saver (Third business day)
FedEx Letter Rate not available. Minimum charge: One pound rate.

4b Express Freight Service Packages over 150 lbs.

Delivery commitment may be later in some areas.

FedEx Overnight Freight (Next business day) FedEx 2Day Freight (Second business day) FedEx Express Saver Freight (Up to 3 business days)

(Call for delivery schedule. See back for detailed descriptions of freight services.)

5 Packaging

FedEx Letter (Declared value limit \$500) FedEx Pak FedEx Box FedEx Tube Other Pkg.

6 Special Handling

(One box must be checked)

Does this shipment contain dangerous goods? No (As per attached Shipper's Declaration) Yes (Shipper's Declaration not required)

Dry Ice (Dry Ice, 9, UN 1845) x _____ kg. Cargo Aircraft Only
*Dangerous Goods cannot be shipped in FedEx packaging.

7 Payment

Bill to: Sender (Account No. in Section 1 will be billed) Recipient (Enter FedEx Account No. or Credit Card No. below) Third Party Credit Card Cash/Check

FedEx Account No. 1009 4429 4 Exp. Date _____
Credit Card No. _____

Total Packages _____ Total Weight _____ Total Declared Value* \$.00 Total Charges \$ _____

*When declaring a value higher than \$100 per shipment, you pay an additional charge. See SERVICE CONDITIONS, DECLARED VALUE, AND LIMIT OF LIABILITY section for further information.

8 Release Signature Sign to authorize delivery without obtaining signature.

Your signature authorizes Federal Express to deliver this shipment without obtaining a signature and agrees to indemnify and hold harmless Federal Express from any resulting claims.

321

WCSL 0398
Rev. Date 12/97
Pan #153023
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RETAIN THIS COPY FOR YOUR RECORDS

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)	B. Date of Delivery
<p>1. Article Addressed to:</p> <p>Mr. Benny Susi, P.E. Golder Associates, Inc. 6241 NW 23 Street Gainesville, FL 32553-1500</p>	C. Signature	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
<p>2. Article Number (Copy from service label)</p> <p>7000 2870 0000 7028 2546</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 1999</p>	<p>3. Service Type</p> <p><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>Domestic Return Receipt</p>		<p>102595-99-M-1789</p>

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

7000 2870 0000 7028 2546

Mr. Benny Susi, P.E. L U S E

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

Sent To
 Golder Associates
 Street, Apt. No., or PO Box No.
 6241 NW 23 St.
 City, State, and ZIP+4®
 Gainesville, FL 32653-1500

PS Form 3800, May 2000 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Benny Susi, P.E.
 Golder Associates, Inc.
 6241 NW 23rd Street, Suite 500
 Gainesville, FL 32653

2. Article Number (Copy from service label)

7000 2870 0000 7028 2874

PS Form 3811, July 1999

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

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

Rick Stransky 10-29-01

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address

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 \$

Postmark Here

Sent To

Benny Susi, P.E.

Street, Apt. No.; or PO Box No.

6241 NW 23rd St., Suite 500

City, State, ZIP+4

Gainesville, FL 32653

PS Form 3800, May 2000

See Reverse for Instructions

7000 2870 0000 7028 2874

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. David G. Steedman
 Vice President of Operations
 Nailite International, Inc.
 1111 NW 165th Street
 Miami, FL 33169

2. Article Number (Copy from service label)

7000 2870 0000 7028 2881

PS Form 3811, July 1999

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

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

Kim Pacheco 10/29

C. Signature Agent
 Addressee

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

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 \$

Postmark Here

Sent To

David G. Steedman

Street, Apt. No.; or PO Box No.

1111 NW 165th Street

City, State, ZIP+4

Miami, FL 33169

PS Form 3800, May 2000

See Reverse for Instructions

7000 2870 0000 7028 2881

FedEx USA Airbill

FedEx Tracking Number

806095050255

Form I.D. No.

0210

SOR 13
Sender's Copy

1 From (please print and press hard)

Date 8-4-00 Sender's FedEx Account Number 1042-1506-2

Sender's Name AL Linero Phone (850) 921-9523

Company DEPT OF ENVIR PROTECTION-MS

Address 2600 BLAIR STONE RD Dept./Floor/Suite/Room

City TALLAHASSEE State FL ZIP 32399

2 Your Internal Billing Reference Information
(Optional) (First 24 characters will appear on invoice)

3 To (please print and press hard)

Recipient's Name Mr. David G. Steedman Phone (305) 620-6200

Company Nailite International, Inc.

Address 1111 NW 165th Street (We Cannot Deliver to P.O. Boxes or P.O. ZIP Codes) Dept./Floor/Suite/Room

City Miami State FL ZIP 33169

For HOLD at FedEx Location check here

Hold Weekday (Not available with FedEx First Overnight) **Hold Saturday** (Not available at all locations) (Available for FedEx Priority Overnight and FedEx 2Day only)

For WEEKEND Delivery check here (Extra Charge. Not available to all locations)

Saturday Delivery (Available for FedEx Priority Overnight and FedEx 2Day only) **NEW Sunday Delivery** (Available for FedEx Priority Overnight only)

Service Conditions, Declared Value, and Limit of Liability - By using this Airbill, you agree to the service conditions in our current Service Guide or U.S. Government Service Guide. Both are available on request. SEE BACK OF SENDER'S COPY OF THIS AIRBILL FOR INFORMATION AND ADDITIONAL TERMS. We will not be responsible for any claim in excess of \$100 per package whether the result of loss, damage, or delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, and document your

actual loss in a timely manner. Your right to recover from us for any loss includes intrinsic value of the package, loss of sales, interest, profit, attorney's fees, costs, and other forms of damage, whether direct, incidental, consequential, or special, and is limited to the greater of \$100 or the declared value but cannot exceed actual documented loss. The maximum declared value for any FedEx Letter and FedEx Pak is \$500. Federal Express may, upon your request, and with some limitations, refund all transportation charges paid. See the FedEx Service Guide for further details.

Questions?

Call 1-800-Go-FedEx® (800)463-3339

The World On Time

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4a Express Package Service Packages under 150 lbs.

FedEx Priority Overnight (Next business morning) **FedEx Standard Overnight** (Next business afternoon) **FedEx First Overnight** (Earliest next business morning delivery to select locations) (Higher rates apply) **FedEx 2Day** (Second business day) **FedEx Express Saver** (Third business day) **FedEx Letter Rate** not available. Minimum charge: One pound rate.

4b Express Freight Service Packages over 150 lbs.

FedEx Overnight Freight (Next business day) **FedEx 2Day Freight** (Second business day) **FedEx Express Saver Freight** (Up to 3 business days)

(Call for delivery schedule. See back for detailed descriptions of freight services.)

5 Packaging

FedEx Letter (Declared value limit \$500) **FedEx Pak** **FedEx Box** **FedEx Tube** **Other Pkg.**

6 Special Handling

Does this shipment contain dangerous goods? **No** (One box must be checked) **Yes** (As per attached Shipper's Declaration) **Yes** (Shipper's Declaration not required) **Dry Ice** (Dry Ice, 9, UN 1845) x _____ kg. **Cargo Aircraft Only** (Dangerous Goods cannot be shipped in FedEx packaging)

7 Payment

Bill to: **Sender** (Account No. in Section 1 will be billed) **Recipient** (Enter FedEx Account No. or Credit Card No. below) **Third Party** **Credit Card** **Cash/Check**

FedEx Account No. 100944394 1009 4439 4 Exp. Date _____

Total Packages _____ Total Weight _____ Total Declared Value* \$ _____ .00 \$ Total Charges _____

*When declaring a value higher than \$100 per shipment, you pay an additional charge. See SERVICE CONDITIONS, DECLARED VALUE, AND LIMIT OF LIABILITY section for further information.

8 Release Signature Sign to authorize delivery without obtaining signature.

Your signature authorizes Federal Express to deliver this shipment without obtaining a signature and agrees to indemnify and hold harmless Federal Express from any resulting claims.

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FedEx USA Airbill

FedEx Tracking Number

806095050244

Form I.D. No.

0210

SOR13
Sender's Copy**1 From** (please print and press hard)Date 4-4-00 Sender's FedEx Account Number 1043 1506-2Sender's Name Al Linero Phone 850 921-9523Company DEPT OF ENVIR PROTECTION-MSAddress 2600 BLAIR STONE RD

Dept./Floor/Suite/Room

City TALLAHASSEE State FL ZIP 32399**2 Your Internal Billing Reference Information**
(Optional) (First 24 characters will appear on invoice)**3 To** (please print and press hard)Recipient's Name Benny Susi Phone (561) 994-9910Company Golder Associates, Inc.Address 1801 Clint Moore Rd., Suite 105 Dept./Floor/Suite/Room
(To 'HOLD' at FedEx location, print FedEx address here) (We Cannot Deliver to P.O. Boxes or P.O. ZIP Codes) Check here if residence (Extra charge applies for FedEx Express Saver)City Boca Raton State FL ZIP 33487**For HOLD at FedEx Location check here** **Hold Weekday**
(Not available with FedEx First Overnight) **Hold Saturday** (Not available at all locations)
(Available for FedEx Priority Overnight and FedEx 2Day only)**For WEEKEND Delivery check here** (Extra Charge. Not available to all locations) **Saturday Delivery**
(Available for FedEx Priority Overnight and FedEx 2Day only) **NEW Sunday Delivery**
(Available for FedEx Priority Overnight only)

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actual loss in a timely manner. Your right to recover from us for any loss includes intrinsic value of the package, loss of sales, interest, profit, attorney's fees, costs, and other forms of damage, whether direct, incidental, consequential, or special, and is limited to the greater of \$100 or the declared value but cannot exceed actual documented loss. The maximum declared value for any FedEx Letter and FedEx Pak is \$500. Federal Express may, upon your request, and with some limitations, refund all transportation charges paid. See the FedEx Service Guide for further details.

Questions?

Call 1-800-Go-FedEx® (800)463-3339

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4a Express Package Service Packages under 150 lbs. Delivery commitment may be later in some areas. FedEx Priority Overnight (Next business morning) FedEx Standard Overnight (Next business afternoon) FedEx First Overnight (Earliest next business morning delivery to select locations) (Higher rates apply) FedEx 2Day (Second business day) FedEx Express Saver (Third business day)

FedEx Letter Rate not available. Minimum charge: One pound rate.

4b Express Freight Service Packages over 150 lbs. Delivery commitment may be later in some areas. FedEx Overnight Freight (Next business day) FedEx 2Day Freight (Second business day) FedEx Express Saver Freight (Up to 3 business days)

(Call for delivery schedule. See back for detailed descriptions of freight services.)

5 Packaging FedEx Letter (Declared value limit \$500) FedEx Pak FedEx Box FedEx Tube Other Pkg.**6 Special Handling** (One box must be checked) (As per attached Shipper's Declaration) (Shipper's Declaration not required)Does this shipment contain dangerous goods? No Yes Yes (Shipper's Declaration not required) Dry Ice (Dry Ice, 9, UN 1845) Cargo Aircraft Only

*Dangerous Goods cannot be shipped in FedEx packaging.

7 PaymentBill to: Sender (Account No. in Section 1 will be billed) Recipient (Enter FedEx Account No. or Credit Card No. below) Third Party Credit Card Cash/CheckFedEx Account No. 1009 4439 4 Exp. Date

Total Packages Total Weight Total Declared Value \$.00 Total Charges

* When declaring a value higher than \$100 per shipment, you pay an additional charge. See SERVICE CONDITIONS, DECLARED VALUE, AND LIMIT OF LIABILITY section for further information.

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