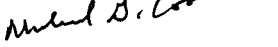



Florida Department of  
Environmental Protection

Memorandum

---

TO: Michael G. Cooke 

THRU: Trina L. Vielhauer

FROM: Al Linero 

DATE: September 4, 2003

SUBJECT: Permit Revision for Nailite International, Inc.  
Permit No. 0250407-007-AC (PSD-FL-289B)

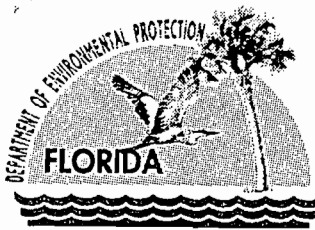
Attached for approval and signature is the final permit package that revises certain conditions in Nailite's existing air construction permit

Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency requirements.

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. Therefore I recommend extending the construction permit until June 30, 2004 and authorizing operation of Line 1 only through that date.

I incorporated the Compliance Plan that was included by Miami-Dade DERM in the Proposed Title V Operation Permit that is presently under review by EPA. It addresses the specific measures and milestones to allow Nailite to comply with the design specifications of the construction permit. At the completion of the Compliance Plan, they will submit another construction permit application to set final collection and destruction efficiency. At that time, they will be in a better position to request indefinite operation of Line 1 and we will have a better basis for making a decision on the matter.

I recommend your approval.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

September 4, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Request to Re-Issue and Modify Construction Permit  
DEP File Nos. 0250407-005-AC and 0250407-007-AC. (PSD-FL-289B)

Dear Mr. Perry:

The Department received Nailite's request on April 21 (complete April 25) requesting re-issuance and modification of the air permit to construct Line 2 at and relocate Line 1 to the new building at 1111 NW 165<sup>th</sup> Street in Miami.

Specifically, Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency.

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. After receiving this information, the Department will consider whether indefinite operation of Line 1, based on the described emission testing program, should be authorized.

The expiration date of Air Construction Permit Number 0250407-005-AC is hereby extended from December 31, 2003 to June 30, 2004. Specific Condition 2 is hereby modified as follows:

The maximum amount of coating applied shall be 300,000 gallons per line per year. The No. 1 Spray Coating Line (EU-001) shall be allowed to operate through ~~December 31, 2003~~ June 30, 2004, and not thereafter. EU-001 shall only operate while appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that its emissions are controlled along with those from Emissions Unit 004. Total hourly and annual emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the RTO shall be established within 45 days of receipt of the emission test results required in Specific Conditions Nos. 3 and 4 below.  
[Rules 62-4.070(3), 62-204.800(10)(d)2., 62-210.200 (PTE), F.A.C., and 62-204.800(11)(d)2 (MACT), F.A.C.]

The following Compliance Plan is hereby incorporated into and made a part of this permit.

*"More Protection, Less Process"*

*Printed on recycled paper.*

## Compliance Plan

### Background:

The owner or operator was unable to demonstrate compliance with the terms and conditions of their air construction permit, No. 0250407-005-AC/PSD-FL-289A, related to the VOC (volatile organic compounds) capture efficiency requirements of a Regenerative Thermal Oxidizer (RTO) system. Specifically, initial testing results indicated collection efficiencies from Paint Lines 1 and 2 in the range of 80 to 85 percent, which are below the design values of 95 percent indicated in the construction permit. The Florida Department of Environmental Protection (FDEP) has determined that further construction, measures (as stated below) and testing are required prior to finalizing collection and destruction efficiency limits for the RTO.

### Conceptual Proposal:

1. Nailite has agreed to substantially improve capture efficiency in accordance with a plan submitted to DERM and FDEP on May 1, 2003. Nailite's plan to improve capture of VOCs, proposes enclosing the existing open areas as follows:
  - i) Enclose the following existing open areas in Paint Line 1 to capture the flashed off solvent, and send the air/solvent mixture to the RTO:
    - a. The conveyor system between the booths.
    - b. The conveyor system between the final paint booth and the entrance of the curing oven.
    - c. Infrared curing oven.
    - d. The conveyor cleaning system.
  - ii) Enclose the following existing open areas in Paint Line 2 to capture the flashed off solvent, and send the air/solvent mixture to the RTO:
    - a. The conveyor system between the booths.
    - b. The conveyor system between the final paint booth and the entrance of the curing oven.
    - c. The conveyor cleaning system.

### Compliance Plan:

1. The purpose of this Compliance Plan is to set appropriate milestones/requirements for the company to follow in order to complete construction and testing necessary to establish final collection and destruction efficiency limits for the RTO.
  - i) Nailite shall make necessary modifications to improve collection of VOC vapors from Paint Lines 1 and 2;
  - ii) After making any system modifications, Nailite shall conduct performance testing to determine the capture and destruction efficiencies of the RTO System and submit the applicable test results to the DERM and FDEP within 45 days after the last test run pursuant to Rule 62-297.310(8), F.A.C., but no later than April 1, 2004. Nailite shall notify FDEP and the DERM in writing at least 15 days prior to any performance tests pursuant to Rule 62-297.310(7)(a)9., F.A.C. The FDEP's address for notification is noted in condition 1. iii), below. DERM's address for notification is:

Ms. Mallika Muthiah, Chief  
Air Facilities Section  
33 S.W. 2 Avenue, Suite 900  
Miami, Florida 33130-1540

Any performance tests shall be conducted using approved methodology established in the AC and as agreed upon with Miami-Dade County DERM.

iii) Nailite shall apply for an air construction permit revision to establish final collection and destruction values for the RTO from the New Source Review Section of the FDEP pursuant to Rules 62-4.050, 62-4.070, 62-210.300(1), 62-212.400(2)(d) and 62-212.400(7)(a), F.A.C., by June 30, 2004. All construction permit applications must be submitted to:

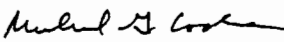
Ms. Trina L. Vielhauer, Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400

2. Title V Air Operation Permit Revision or Air Operation Permit. Nailite shall submit an application for a Revision to the Title V Air Operation Permit to DERM to incorporate the terms and conditions established in the AC issued pursuant to paragraph 1(iii), above, within 30 days of the AC's issue date, Pursuant to Rules 62-4.050, 62-4.070, 62-210.300(2), 62-212.400(7)(b) and 62-213.420, F.A.C.
3. Nailite shall operate the facility no more than 7,280 hours per year such that it does not constitute a Major Facility for purposes of Chapter 62-212, F.A.C.

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

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

Executed in Tallahassee, Florida.

  
\_\_\_\_\_  
Michael G. Cooke, Director  
Division of Air Resources  
Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 9/5/03 to the person(s) listed:

Howard Wasserman, NII\*  
John Perry, NII\*  
Victor Rossinski, CRB\*  
Tom Tittle, DEP SED  
Mallika Muthiah, Miami-Dade DERM

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

*Victoria Gibson* / *September 5, 2003*  
(Clerk) / (Date)

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

Mr. John Perry  
 Vice President, Operations  
 Nailite International  
 1111 NW 165th Street  
 Miami, FL 33169-5819

2. Arti

7001 0320 0001 3692 6136

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

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

9/8

C. Signature

*MacKerrow*

- Agent
- Addressee

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

3. Service Type

- Certified Mail  Express Mail
- Registered  Return Receipt for Merchandise
- Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

7001 0320 0001 3692 6136

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

[Blacked out area]

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

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

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 6143

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

[Blacked out area]

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

Sent To  
 Victor Rossinsky  
 Street, Apt. No.,  
 or P.O. Box No. Ponce DeLeon Blvd.  
 City, State, ZIP+4  
 Coral Gables, FL 33146

PS Form 3800, January 2001 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:

Victor Rossinsky, Jr., Ph.D., P.G.  
 Senior Project Manager  
 CRB  
 4573 Ponce DeLeon Blvd.  
 Coral Gables, FL 33146

2.

7001 0320 0001 3692 6143

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

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

9/8/03

C. Signature

*Barbara Lwin*

- Agent
- Addressee

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

3. Service Type

- Certified Mail  Express Mail
- Registered  Return Receipt for Merchandise
- Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) _____</p> <p>B. Date of Delivery <u>9/8</u></p>
<p>1. Article Addressed to:</p> <p>Mr. Howard Wasserman          President &amp; CEO          Nailite International, Inc.          1111 NW 165th Street          Miami, FL 33169-5819</p>	<p>C. Signature <u>x Jackson</u></p> <p><input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>
<p>2. <u>7001 0320 0001 3692 5337</u></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 <span style="float: right;">102595-99-M-1789</span></p>

<b>U.S. Postal Service</b> <b>CERTIFIED MAIL RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>											
<b>OFFICIAL USE</b>											
<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><b>Total Postage &amp; Fees</b></td> <td><b>\$</b></td> </tr> </table>	Postage	\$	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		<b>Total Postage &amp; Fees</b>	<b>\$</b>	Postmark Here
Postage	\$										
Certified Fee											
Return Receipt Fee (Endorsement Required)											
Restricted Delivery Fee (Endorsement Required)											
<b>Total Postage &amp; Fees</b>	<b>\$</b>										
<p>Sent To</p> <p><u>Howard Wasserman</u></p> <p>Street, Apt. No., or P.O. No. <u>NW 165th St.</u></p> <p>City, State, ZIP+4 <u>Miami, FL 33169-5819</u></p>	<p>PS Form 3800, January 2001 <span style="float: right;">See Reverse for Instructions</span></p>										

7001 0320 0001 3692 5337

Howard Wasserman  
Nailite International  
1111 NW 165<sup>th</sup> St.  
Miami FL 33169  
Tel. 305-620-6200 ext. 222  
Fax 305-623-6538

## facsimile transmittal

To: Al Linero, Florida DEP      Fax: 850-921-9533

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From: Howard Wasserman      Date: 8/21/2003

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Re: Public Notice      Pages: 1 of 4

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CC:

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Urgent     For Review     Please Comment     Please Reply     Please Recycle

The following was mailed to Trina Vielhauer by CRB on July 30, 2003.

- 1.) Patty - Please enter in ARMS as received on August 21<sup>st</sup>. This goes to Nailite File.
- 2.) Teresa - Prepare for signature for 14 days after August 21<sup>st</sup>.
- 3.) They do not appear to have certified this letter and no one appears to have received it until this fax of August 21<sup>st</sup>.



**CRB**

GEOLOGICAL &amp; ENVIRONMENTAL SERVICES, INC.

July 30, 2003

Ms. Trina Vielhauer, Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

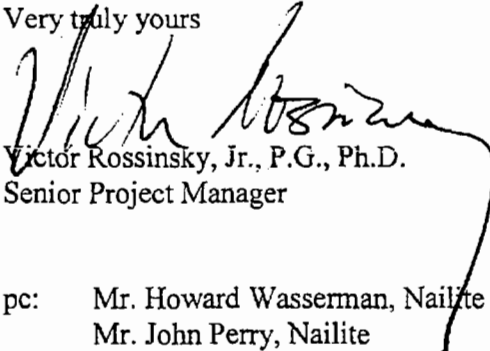
Re: CRB Project No. NAI 553-05; Construction Permit Modifications for the Nailite International Facility, located at 1111 NW 165<sup>th</sup> Street, Miami, Florida; DEP File No. 0250407-007-AC (PSD-FL-289B)

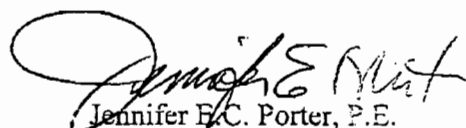
Dear Ms. Vielhauer:

Enclosed herewith please find the original proof of publication for the Public Notice of Intent to Issue Air Construction Permit Modification for the above referenced site. This notice was published in the legal advertisements section of the Dade County version of the Miami Daily Business Review on Tuesday, July 29, 2003.

If you have any questions or require additional information, please feel free to call this office.

Very truly yours

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

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

pc: Mr. Howard Wasserman, Nailite  
Mr. John Perry, Nailite

### MIAMI DAILY BUSINESS REVIEW

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

STATE OF FLORIDA  
COUNTY OF MIAMI-DADE:

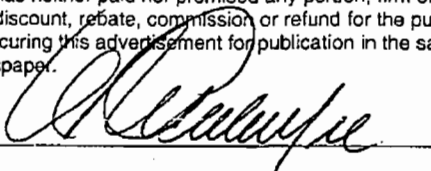
Before the undersigned authority personally appeared O.V. FERBEYRE, who on oath says that he or she is the SUPERVISOR, Legal Notices of the Miami Daily Business Review f/k/a Miami Review, a daily (except Saturday, Sunday and Legal Holidays) newspaper, published at Miami in Miami-Dade County, Florida;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

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

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

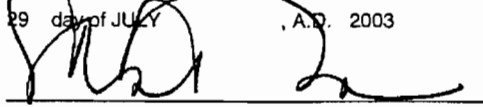
07/29/2003

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




Sworn to and subscribed before me this

29 day of JULY, A.D. 2003



(SEAL)

O.V. FERBEYRE personally known to me

 State of Florida	MARIA I. MESA Notary Public Commission # CC 885640 EXPIRES: March 4, 2004 Bonded Thru Notary Public Underwriters
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### PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DEP FILE NO. 0250407-007-AC

NAILITE INTERNATIONAL, INC.  
MIAMI-DADE COUNTY

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new location. A review pursuant to the Rules for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) pursuant to Rule 62-212.400, F.A.C. was previously conducted. A determination of Maximum Achievable Control Technology (MACT) pursuant to 40 CFR 63, Subpart B and Rule 62-204.800 was previously conducted. The applicant's new location and mailing address is Nailite International, Inc., 1111 NW 165th Street, Miami, Florida. 33169.

Nailite manufactures molded plastic panels from polypropylene pellets and coats them in a series of paint booths. The previously issued permit specified the capture of volatile organic compounds (VOC) from the Line 2 and their destruction in a Regenerative Thermal Oxidizer (RTO). Relocation and operation of the previously uncontrolled Line 1 was authorized until December 31, 2003 provided it was connected to the new RTO.

Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency requirements.

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. Therefore the construction permit will be extended until June 30, 2004 and operation of Line 1 will be authorized through that date. The Department will consider indefinite operation of Line 1 based on the described emission testing program. The decision will also be publicly noticed.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Modified Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5535, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

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

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

A petition that disputes the material facts upon which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed for formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. A complete project is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at:

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


The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information.  
7/29 03-4-2778 83254M

# Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer

FROM: Al Linero 

DATE: July 18, 2003

SUBJECT: Draft Permit Revision for Nailite International, Inc.  
Permit No. 0250407-007-AC (PSD-FL-289B)

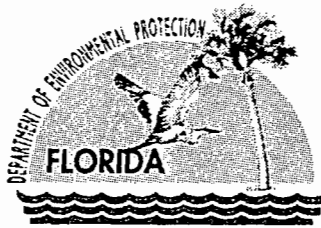
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Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency requirements.

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. Therefore I recommend extending the construction permit until June 30, 2004 and authorizing operation of Line 1 only through that date.

I incorporated the Compliance Plan that was included by Miami-Dade DERM in the Proposed Title V Operation Permit that is presently under review by EPA. It addresses the specific measures and milestones to allow Nailite to comply with the design specifications of the construction permit. At the completion of the Compliance Plan, they will submit another construction permit application to set final collection and destruction efficiency. At that time, they will be in a better position to request indefinite operation of Line 1 and we will have a better basis for making a decision on the matter.

I recommend your approval. Today (July 18) is Day 85.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

July 21, 2003

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0250407-007-AC (PSD-FL-289B)  
Construction Permit Modification - New Panel Line and Relocation of Existing Panel Line

Dear Mr. Perry:

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

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

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Mr. Linero at 850/921-9523.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

TLV/al

Enclosures

"More Protection, Less Process"

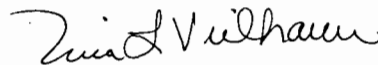
Printed on recycled paper.

(implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

In the Matter of an  
Application for Permit Modification by:

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

DEP File No. 0250407-007-AC (PSD-FL-289B)  
Spray Coating Lines No. 1 and No.2  
Miami-Dade County

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**INTENT TO ISSUE MODIFIED AIR CONSTRUCTION PERMIT**

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

The applicant, Nailite International, Inc., applied on April 21 (complete April 25), 2003 to the Department for modification of the previously issued air construction permit that provided for installation of a new paint line at and relocation of an existing line to 1111 NW 165th Street, Miami, Dade County. Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency requirements.

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

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. Therefore the construction permit will be extended until June 30, 2004 and operation of Line 1 will be authorized through that date. The Department will consider indefinite operation of Line 1 based on the described emission testing program. The decision will also be publicly noticed.

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

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

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

The Department will accept written comments concerning the proposed permit modification issuance action for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail

Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

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

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

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

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

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying




(implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

Executed in Tallahassee, Florida.

  
Trina Vielhauer, Chief  
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit Modification (including the Public Notice, and the Draft Permit Modification) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 7/22/03 to the person(s) listed:

Howard Wasserman\*  
John Perry \*  
Victor Rossinsky, CRB  
Tom Tittle, SED  
Patrick Wong, Miami-Dade DERM  
Gregg Worley, EPA

**Clerk Stamp**  
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk) July 23, 2003  
(Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DEP File No. 0250407-007-AC

Nailite International, Inc.  
Miami-Dade County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification for the previously-approved installation of a new paint line at and relocation of an existing line to Nailite's new location. A review pursuant to the Rules for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) pursuant to Rule 62-212.400, F.A.C. was previously conducted. A determination of Maximum Achievable Control Technology (MACT) pursuant to 40 CFR 63, Subpart B and Rule 62-204.800 was previously conducted. The applicant's new location and mailing address is Nailite International, Inc., 1111 NW 165th Street, Miami, Florida 33169.

Nailite manufactures molded plastic panels from polypropylene pellets and coats them in a series of paint booths. The previously issued permit specified the capture of volatile organic compounds (VOC) from the Line 2 and their destruction in a Regenerative Thermal Oxidizer (RTO). Relocation and operation of the previously uncontrolled Line 1 was authorized until December 31, 2003 provided it was connected to the new RTO.

Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency requirements.

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. Therefore the construction permit will be extended until June 30, 2004 and operation of Line 1 will be authorized through that date. The Department will consider indefinite operation of Line 1 based on the described emission testing program. The decision will also be publicly noticed.

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

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

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be

**NOTICE TO BE PUBLISHED IN THE NEWSPAPER**

filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Miami-Dade County Department of Environmental Resources Mgmt. 33 S.W. 2 <sup>nd</sup> Avenue, Suite 900 Miami, Florida 33130-1540 Telephone: 305/372-6925 Fax: 305/372-6954	Dept. of Environmental Protection Southeast District Office 400 North Congress Avenue West Palm Beach, FL 33416-5425 Telephone: 561/681-6600 Fax: 561/681-6755
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The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, FL 32301 or call 850/488-0114 for additional information.

**NOTICE TO BE PUBLISHED IN THE NEWSPAPER**

Month Day, 2003 DRAFT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Request to Re-Issue and Modify Construction Permit  
DEP File Nos. 0250407-005-AC and 0250407-007-AC (PSD-FL-289B)

Dear Mr. Perry:

The Department received Nailite's request on April 21 (complete April 25) requesting re-issuance of and modification of the air permit to construct Line 2 at and relocate Line 1 to the new building at 1111 NW 165<sup>th</sup> Street in Miami.

Specifically, Nailite requested: authorization to further modify Lines 1 and 2 in order to increase VOC capture efficiency of the system; indefinite future operation of Line 1; and to use results from emissions testing (to be conducted) subsequent to the construction of additional line modifications to establish capture and destruction efficiency.

The further modifications of Lines 1 and 2 are already authorized by the existing construction permit and only an extension is required. The information allowing the Department to make a decision on the indefinite operation of Line 1 will not be available until April 2004. The Department will consider indefinite operation of Line 1 based on the described emission testing program.

The expiration date of Air Construction Permit Number 0250407-005-AC is hereby extended from December 31, 2003 to June 30, 2004. Specific Condition 2 is hereby modified as follows:

The maximum amount of coating applied shall be 300,000 gallons per line per year. The No. 1 Spray Coating Line (EU-001) shall be allowed to operate through ~~December 31, 2003~~ June 30, 2004, and not thereafter. EU-001 shall only operate while appropriately connected to the Regenerative Thermal Oxidizer (RTO) so that its emissions are controlled along with those from Emissions Unit 004. Total hourly and annual emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) from the RTO shall be established within 45 days of receipt of the emission test results required in Specific Conditions Nos. 3 and 4 below.

[Rules 62-4.070(3), 62-204.800(10)(d)2., and 62-210.200 (PTE), F.A.C., and MACT

The following Compliance Plan is hereby incorporated into and made a part of this permit.

## Compliance Plan

### Background:

The owner or operator was unable to demonstrate compliance with the terms and conditions of their air construction permit, No. 0250407-005-AC/PSD-FL-289A, related to the VOC (volatile organic compounds) capture efficiency requirements of a Regenerative Thermal Oxidizer (RTO) system. Specifically, initial testing results indicated collection efficiencies from Paint Lines 1 and 2 in the range of 80 to 85 percent, which are below the design values of 95 percent indicated in the construction permit. The Florida Department of Environmental Protection (FDEP) has determined that further construction, measures and testing are required prior to finalizing collection and destruction efficiency limits for the RTO.

### Conceptual Proposal:

1. Nailite has agreed to substantially improve capture efficiency in accordance with a plan submitted to DERM and FDEP on May 1, 2003. Nailite's plan to improve capture of VOCs, proposes enclosing the existing open areas as follows:
  - i) Enclose the following existing open areas in Paint Line 1 to capture the flashed off solvent, and send the air/solvent mixture to the RTO:
    - a. The conveyor system between the booths.
    - b. The conveyor system between the final paint booth and the entrance of the curing oven.
    - c. Infrared curing oven.
    - d. The conveyor cleaning system.
  - ii) Enclose the following existing open areas in Paint Line 2 to capture the flashed off solvent, and send the air/solvent mixture to the RTO:
    - a. The conveyor system between the booths.
    - b. The conveyor system between the final paint booth and the entrance of the curing oven.
    - c. The conveyor cleaning system.

### Compliance Plan:

1. The purpose of this Compliance Plan is to set appropriate milestones/requirements for the company to follow in order to complete construction and testing necessary to establish final collection and destruction efficiency limits for the RTO.
  - i) Nailite shall make necessary modifications to improve collection of VOC vapors from Paint Lines 1 and 2;
  - ii) After making any system modifications, Nailite shall conduct performance testing to determine the capture and destruction efficiencies of the RTO System and submit the applicable test results to the DERM and FDEP within 45 days after the last test run pursuant to Rule 62-297.310(8), F.A.C but no later than April 1, 2004. Nailite shall notify FDEP and the DERM in writing at least 15 days prior to any performance tests pursuant to Rule 62-297.310(7)(a)9., F.A.C. The FDEP's address for notification is noted in condition 1. iii), below. DERM's address for notification is:

Ms. Mallika Muthiah, Chief  
Air Facilities Section  
33 S.W. 2 Avenue, Suite 900  
Miami, Florida 33130-1540

Any performance tests shall be conducted using approved methodology established in the AC and as agreed upon with Miami-Dade County DERM.

- iii) Nailite shall apply for an air construction permit revision to establish final collection and destruction values for the RTO from the New Source Review Section of the FDEP pursuant to Rules 62-4.050, 62-4.070, 62-210.300(1), 62-212.400(2)(d) and 62-212.400(7)(a), F.A.C., by June 30, 2004. All construction permit applications must be submitted to:

Ms. Trina L. Vielhauer, Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400

2. Title V Air Operation Permit Revision or Air Operation Permit. Nailite shall submit an application for a Revision to the Title V Air Operation Permit to DERM to incorporate the terms and conditions established in the AC issued pursuant to paragraph 1(iii), above, within 30 days of the AC's issue date, Pursuant to Rules 62-4.050, 62-4.070, 62-210.300(2), 62-212.400(7)(b) and 62-213.420, F.A.C.
3. Nailite shall operate the facility no more than 7,280 hours per year] such that it does not constitute a Major Facility for purposes of Chapter 62-212, F.A.C., F.A.C.

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

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

Executed in Tallahassee, Florida:

\_\_\_\_\_  
Director  
Division of Air Resources  
Management

**CERTIFICATE OF SERVICE**

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

Howard Wasserman, NII\*  
John Perry, NII\*  
Victor Rossinski, CRB\*  
Tom Tittle, DEP SED  
Mallika Muthiah, Miami-Dade DERM

Clerk Stamp

**FILED AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

**DRAFT**

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

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

2. 7001 0320 0001 3692 5542

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

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

DIANA DIAR 7/25/03

C. Signature

X D. Diar

- Agent  
 Addressee

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

3. Service Type

- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**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 John Perry

Street, Apt. No., or P.O. No. NW 165th St.

City, State, ZIP+4 Miami, FL 33169

PS Form 3800, January 2001

See Reverse for Instructions

**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 Howard Wasserman

Street, Apt. No., or P.O. No. NW 165th St.

City, State, ZIP+4 Miami, FL 33169-5819

PS Form 3800, January 2001

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

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

2. 7001 0320 0001 3692 5535

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

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

DIANA DIAR 7/25

C. Signature

X D. Diar

- Agent  
 Addressee

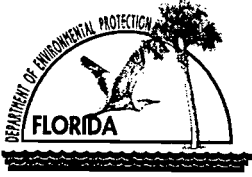
D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes





# Department of Environmental Protection

## Division of Air Resources Management

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APR 25 2003

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

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

BUREAU OF AIR REGULATION

#### I. APPLICATION INFORMATION

##### Identification of Facility

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

##### Application Contact

1. Name and Title of Application Contact: John Perry, Vice President of Operations	
2. Application Contact Mailing Address: Organization/Firm: Nailite International, Inc. Street Address: 1111 NW 165 <sup>th</sup> Street City: Miami State: Florida 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:	4-21-03
2. Permit Number:	0250407-007-Ac
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

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

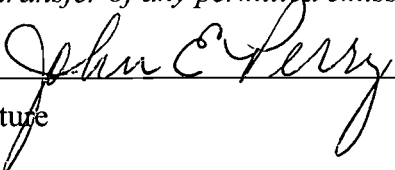
- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a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

**Air Construction Permit Application**

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

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

**Owner/Authorized Representative or Responsible Official**

<p>1. Name and Title of Owner/Authorized Representative or Responsible Official:  <u>John Perry, Vice President of Operations</u></p>
<p>2. Owner/Authorized Representative or Responsible Official Mailing Address:          Organization/Firm: Nailite International, Inc.          Street Address: 1111 NW 165<sup>th</sup> Street          City: Miami State: Florida Zip Code: 33169</p>
<p>3. Owner/Authorized Representative or Responsible Official Telephone Numbers:          Telephone: (305 ) 620 - 6200 Fax: ( 305 ) 623 - 8227</p>
<p>4. Owner/Authorized Representative or Responsible Official Statement:</p> <p><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></p> <p style="text-align: center;">  <span style="margin-left: 300px;"><i>April 23rd, 2003</i></span> </p> <p>Signature <span style="margin-left: 300px;">Date</span></p>

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

**Professional Engineer Certification**

<p>1. Professional Engineer Name: Jennifer E.C. Porter, P.E.          Registration Number: 58144</p>
<p>2. Professional Engineer Mailing Address:          Organization/Firm: CRB Geological &amp; Environmental Services, Inc.          Street Address: 4573 Ponce de Leon Boulevard          City: Coral Gables State: Florida Zip Code: 33146</p>
<p>3. Professional Engineer Telephone Numbers:          Telephone: (305 ) 447 - 9777 Fax: ( 305 ) 567 - 2853</p>

4. Professional Engineer Statement:

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

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

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

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

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

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

*[Handwritten Signature]*  
\_\_\_\_\_  
Signature

*110 April 2003*  
\_\_\_\_\_  
Date

\* Attach any exception to certification statement.



International  
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APR 21 2003

BUREAU OF AIR REGULATION

April 17, 2003

Ms. Mallika Muthiah, P.E.  
Section Chief  
Air Facilities Section  
Miami-Dade County Department of  
Environmental Resources Management  
33 SW 2<sup>nd</sup> Avenue, Suite 900  
Miami, Florida 33130-1540

Re: CRB Project No. NAI 553-05; Nailite International, Inc., located at 1111 NW 165<sup>th</sup> Street, Miami, Florida 33169

Dear Ms. Muthiah:

Pursuant to the conference telephone call held between the Florida Department of Environmental Protection (FDEP), the Miami-Dade County Department of Environmental Resources Management (DERM), CRB Geological & Environmental Services, Inc. (CRB), and Nailite International, Inc. (Nailite) on Thursday, April 10, 2003, this correspondence has been prepared to advise DERM that Nailite approves an extension of time to finalize the "completeness review" that is currently being conducted on the Application for Air Permit – Title V Source. This application was submitted to DERM on March 26, 2003.

Nailite is aware that DERM has sixty (60) days from the date of submittal in which to review the application and request additional information from the applicant. Currently, Nailite is working with the Florida Department of Environmental Protection (FDEP) in order to modify the parameters of the permit. In order to complete these modifications, additional time is necessary to evaluate the current configuration of the painting process and construct improvements to the system. The anticipated improvements will have a direct impact on the Title V air permit application and will enable Nailite to provide DERM with the required supplemental information.

It is anticipated that the sixty (60) day review period will expire prior to the completion of system modifications; therefore, Nailite waives this review period.

If you have any questions or require additional information, please feel free to call this office.

Very truly yours

  
Howard Wasserman  
President & CEO

cc: Mr. Victor Rossinsky, Jr., P.G., Ph.D., CRB  
Ms. Trina Vielhauer, FDEP



**International**  
*The Natural Alternative*

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APR 21 2003

BUREAU OF AIR REGULATION

April 16, 2003

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

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

*0250407-007-AC*

Dear Ms. Vielhauer:

Please consider this document with attachments as a request to reissue the above referenced permit with modifications, as discussed below. The fundamental change requested by Nailite International, Inc. (Nailite) is the removal of the operational deadline for Paint Line No. 1 (EU001) of December 31, 2003. This paint line provides necessary production capacity for Nailite operations, and its continued operation is essential for the success of the facility.

### **Background**

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

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

The relocated facility included the No. 1 plastic panel spray line consisting of three spray booths, and eight injection-molding machines. The construction permit also authorized the installation of a Regenerative Thermal Oxidizer (RTO) and the No. 2 plastic panel spray line consisting of three continuous spray booths and a curing oven. Captured emissions from the No. 1 Line (Emission Unit 001) and the No. 2 Line (Emission Unit 004) were required to be routed to the RTO.

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

### **Emissions Reduction – Paint Usage**

In attempt to reduce volatile organic compound (VOC) emissions on the front-end of the painting process, Nailite has recently incorporated the use of high-solids (low solvent) paints. It is anticipated that high-solids paints will be utilized for one hundred percent (100%) of the painting operations by the end of 2003.

Figure 1 displays Nailite's total emissions from 2000 through 2002. Before 2000, Nailite's yearly emissions showed a dramatic increase from 476,300 pounds (238 tons) in 1998 to 628,450 pounds (314 tons) in 1999 to 897,000 pounds (449 tons) in the year 2000, when they peaked. The diagram in attachment A shows that as a result of several changes at Nailite, 2002 exhibited the lowest emission rate (294,000 pounds or 147 tons) while usage rates will be at its highest.

### **Emissions Reduction – Capture and Destruction Efficiency**

Capture and destruction efficiency testing was performed by Koogler and Associates Environmental Services (Koogler) between January 21 and 23, 2003. The capture efficiency test performed on Paint Line No. 1 indicated a capture efficiency of 84.8 percent. The test performed on Paint Line No. 2 indicated a capture efficiency of 81.5 percent. Destruction efficiency of the RTO unit was measured to be 99.54 percent.

The recent capture and destruction efficiency test results indicate that the RTO unit is operating well above its designed efficiency value. However, capture efficiency test results for both paint lines indicate that these lines are not performing as they were designed.

### **Compliance Plan**

Nailite is committed to complying with all regulatory guidelines with regard to the operation of the two (2) paint lines. Initial plans to modify the paint lines to improve capture efficiency have been implemented. On April 11, 2003, a representative of George Koch Sons, LLC (GKS) was present at Nailite to evaluate the existing systems and offer guidance on improving the capture capabilities of the lines. **Preliminary observations made during that evaluation indicate that the construction of vented enclosures around the exposed sections of the lines will provide for additional capture and increase the efficiencies of the systems.** Nailite is currently awaiting a proposal for system improvements from GKS, as described in the letter included as

Attachment A. Once we receive the proposal we will be able to define a timeline for this compliance plan and further define the technical objectives.

Upon completion of the paint line modifications proposed by GKS, additional capture and destruction efficiency testing will be performed at the facility in order to determine the operating efficiency of the system. It is anticipated that the additional construction will allow the system to meet its optimum efficiency, and that permit conditions can be assigned based on those results.

### Summary

Through a number of emission controls and continued research and development, Nailite achieved a three-fold reduction in emissions from close to 450 tons per year to approximately 150 tons per year. Projected future emissions at a self-imposed operations cap of 7,280 hours per year would keep the facility well under the threshold of a major facility (250 tons per year). Improvements to the construction of both paint lines will result in additional significant reductions in VOC emissions.

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

1. Allow for the modification of Paint Lines No. 1 and 2 (EU-001 and EU-004) in order to increase the capture efficiency of the system.
2. Allow EU-001 to continue operation indefinitely.
3. Utilize results from emissions testing conducted subsequent to the construction of additional line modifications to establish capture and destruction efficiency requirements.

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

Very truly yours,  
Nailite International, Inc.

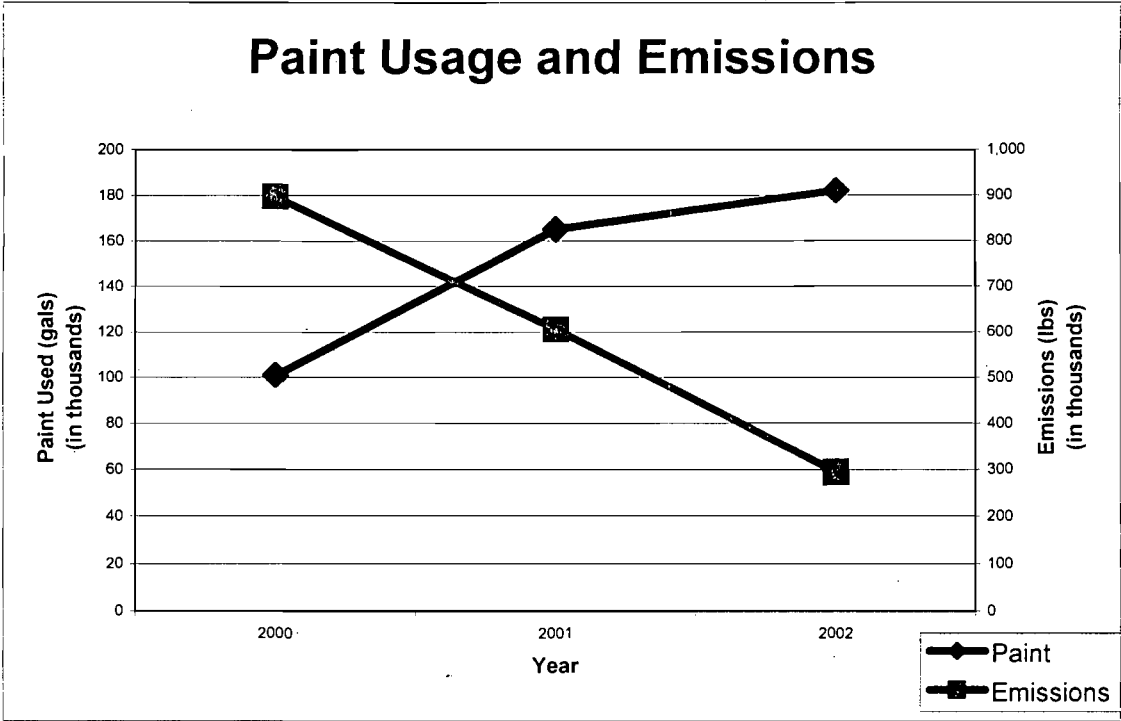


Howard Wasserman  
President & CEO

cc: Ms. Mallika Muthiah, P.E., DERM  
Mr. Victor Rossinsky, Jr., P.G., Ph.D., CRB



# ATTACHMENT A



George Koch Sons, LLC  
10 South Eleventh Avenue  
Evansville, IN 47744  
(812) 465-9600



**Stephen P. Foreman**  
Regional Sales Manager  
Telephone: (812) 465-9668  
Facsimile: (812) 465-9676  
E-Mail: [spf@kochllc.com](mailto:spf@kochllc.com)

April 16, 2003

Mr. Kevin Martin  
Nailite International  
1111 Northwest 165<sup>th</sup> St.  
Miami, FL 33169-5819  
e-mail: [kmartin@nailite.com](mailto:kmartin@nailite.com)

Dear Mr. Martin:

In follow up to our visit to your facility on April 11, 2003, we have compiled the information regarding your painting process, and are working to develop a bid for vented enclosures around the exposed sections of your paint finishing line.

We are working through the calculations for solvent removal, and pricing the necessary labor and materials required to enclose the open sections. Please forward the information on wet film thickness at each spray booth exit point as we will need these figures to finalize our bid.

Thank you for your hospitality during our recent visit. We look forward to working with you on this project.

Sincerely,

A handwritten signature in cursive script that reads 'Stephen Foreman'.

SPForeman/tst  
cc: Steve Martin  
Mark Balthis

Enc.

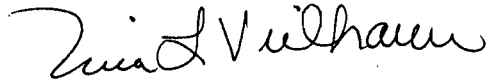
Nailite International, Inc.  
Permit No. 0250407-007-AC

(implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

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

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

Executed in Tallahassee, Florida.

A handwritten signature in black ink, appearing to read "Trina Vielhauer". The signature is fluid and cursive, with the first name "Trina" written in a larger, more prominent script than the last name "Vielhauer".

Trina Vielhauer, Chief  
Bureau of Air Regulation

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

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

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Diana Diaz* B. Date of Delivery *7/25/99*

C. Signature *D. Diaz*  Agent  Addressee

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

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

4. Restricted Delivery? (Extra Fee)  Yes

2. 7001 0320 0001 3692 5542

PS Form 3811, July 1999

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**U.S. Postal Service  
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OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark Here

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

PS Form 3800, January 2001

See Reverse for Instructions

**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)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark Here

Sent To Howard Wasserman  
 Street, Apt. No. or P.O. Box No. NW 165th St.  
 City, State, ZIP+4 Miami, FL 33169-5819

PS Form 3800, January 2001

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) *Diana Diaz* B. Date of Delivery *7/25*

C. Signature *D. Diaz*  Agent  Addressee

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

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

4. Restricted Delivery? (Extra Fee)  Yes

2. 7001 0320 0001 3692 5535

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

7001 0320 0001 3692 5542

7001 0320 0001 3692 5535

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John Perry  
 Vice President, Operations  
 Nailite International  
 1111 NW 165th Street  
 Miami, FL 33169-5819

2. Article Number: 7001 0320 0001 3692 6136

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) \_\_\_\_\_ B. Date of Delivery 9/8

C. Signature X Jackson  Agent  Addressee

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

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

4. Restricted Delivery? (Extra Fee)  Yes

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

(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

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

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

PS Form 3800, January 2001

See Reverse for Instructions

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

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**OFFICIAL USE**

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

Sent To  
Victor Rossinsky  
 Street, Apt. No.,  
 or P.O. Box No. Ponce DeLeon Blvd.  
 City, State, ZIP+4  
Coral Gables, FL 33146

PS Form 3800, January 2001

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:

Victor Rossinsky, Jr., Ph.D., P. G.  
 Senior Project Manager  
 CRB  
 4573 Ponce DeLeon Blvd.  
 Coral Gables, FL 33146

2. Article Number: 7001 0320 0001 3692 6143

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) \_\_\_\_\_ B. Date of Delivery 9/8/03

C. Signature X Barbara Twinn  Agent  Addressee

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

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

4. Restricted Delivery? (Extra Fee)  Yes

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)	B. Date of Delivery 7/8
<p>1. Article Addressed to:</p> <p>Mr. Howard Wasserman President &amp; CEO Nailite International, Inc. 1111 NW 165th Street Miami, FL 33169-5819</p>	<p>C. Signature x <i>Wasserman</i></p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. <u>7001 0320 0001 3692 5337</u></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>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>	

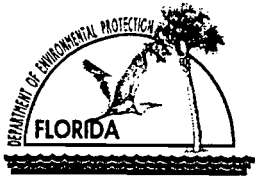
PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

<b>U.S. Postal Service</b> <b>CERTIFIED MAIL RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>											
<b>OFFICIAL USE</b>											
<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><b>Total Postage &amp; Fees</b></td> <td>\$</td> </tr> </table>	Postage	\$	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		<b>Total Postage &amp; Fees</b>	\$	<p>Postmark Here</p>
Postage	\$										
Certified Fee											
Return Receipt Fee (Endorsement Required)											
Restricted Delivery Fee (Endorsement Required)											
<b>Total Postage &amp; Fees</b>	\$										
<p>Sent To Howard Wasserman Street, Apt. No., or P.O. Box No.    1111 NW 165th St. City, State, ZIP+4 Miami, FL 33169-5819</p>											
<p>PS Form 3800, January 2001</p>	<p>See Reverse for Instructions</p>										

7001 0320 0001 3692 5337



# Department of Environmental Protection

Division of Air Resources Management

RECEIVED

APR 25 2003

## APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1) BUREAU OF AIR REGULATION

### I. APPLICATION INFORMATION

#### Identification of Facility

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

#### Application Contact

1. Name and Title of Application Contact: John Perry, Vice President of Operations	
2. Application Contact Mailing Address: Organization/Firm: Nailite International, Inc. Street Address: 1111 NW 165 <sup>th</sup> Street City: Miami State: Florida 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:	4-21-03
2. Permit Number:	0250407-007-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

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

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

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

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

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

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

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

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

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

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

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

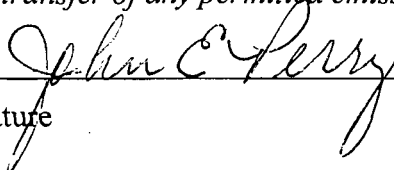
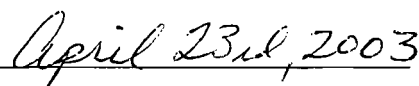
**Air Construction Permit Application**

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

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



**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <u>John Perry, Vice President of Operations</u>
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Nailite International, Inc. Street Address: 1111 NW 165 <sup>th</sup> Street City: Miami State: Florida 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>  <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">               _____              Signature         </div> <div style="text-align: center;">               _____              Date         </div> </div>

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

**Professional Engineer Certification**

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

4. Professional Engineer Statement:

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

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

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

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

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

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

*James E. Clark*  
Signature

*110 April 2003*  
Date

(seal)

\* Attach any exception to certification statement.