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BUREAU OF AIR REGULATION

May 15, 2002

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Mr. Doug Neeley
Air Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: MACT Determination of **Nailite International** located at 1111 NW 165th Street,
Miami, Florida

Dear Ms. Phillips and Mr. Neeley:

Pursuant to your request, CRB Geological & Environmental Services, Inc. (CRB), on behalf of Nailite International, is pleased to provide Section 112(j) of the Clean Air Act notification information requested in a letter dated April 5, 2002, for the above referenced facility. A copy of the correspondence is included in Attachment I.

According to facility records and air permitting designation, Nailite International is a major source of hazardous air pollutants (HAPs). In addition, based on the provided list in the letter dated April 5, 2002, Nailite International is an affected industry type source (Plastic Parts Surface Coating) and is therefore subject to the notification requirement. The requested information is presented below.

(a) The name, address (physical location), and brief description of the major source (facility)

Nailite International
1111 NW 165th Street
Miami, Florida 33169
UTM Coordinates: Zone 17, E 578.4 km, N 2867.2 km

Nailite International manufactures and coats plastic shingles molded from polypropylene pellets. The facility currently operates two (2) paint lines, No.1 and No. 2. The No. 1 line consists of three (3) paint spray booths and a drying oven. The No. 2 line consists of three (3) continuous spray booths and a curing oven. Both lines are connected to a Regenerative Thermal Oxidizer (RTO) for air emissions control.

(b) An identification of the relevant industry type source category.

Plastic Parts (Surface Coating)

(c) A list of the emission units belonging to the relevant industry type source category

EU 001 No. 1 Line-three (3) paint spray booths and a curing oven
EU 004 No. 2 Line-three (3) continuous spray booths and a curing oven

(d) An identification of any affected sources for which a section 112(g) MACT determination has been made.

In the year 2000, Nailite International relocated their operations to a nearby building. A PSD Air Construction permit (0250407-003-AC/PSD-FL-289) was issued to Nailite International in September 2000 for the relocation of their existing paint spray line and for the construction of a new plastic panel spray line at the new location. As part of the permitting activities, in accordance with Section 112(g) of the Clean Air Act, a case-by-case Maximum Achievable Control Technology (MACT) determination for new sources of HAPs was conducted for the facility. As a result of the determination, Nailite International implemented the top control technology, an RTO, to control emissions from the two (2) spray lines.

The operation of the RTO is as follows. The gas stream containing the air pollutants is exposed to high temperatures to oxidize the volatile organic compounds (VOCs) and the HAPs to carbon dioxide (CO₂) and water (H₂O). An auxiliary fuel of natural gas is used to initially reach the high operating temperatures (1600-1700°F) required. The RTO incinerator uses ceramic heat exchanger media to store a large thermal mass generated by the thermal incinerator and then uses the fuel value of the inlet gas stream to maintain the incineration process. With a sufficient concentration of solvents in the incoming process gas, the destruction of VOCs/HAPs is self-sustaining and no auxiliary heat is required from the fuel source.

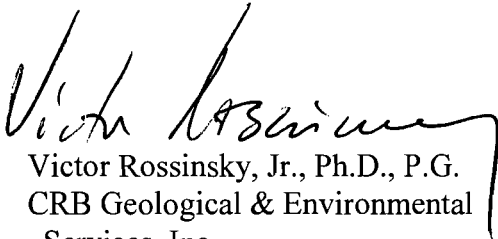
The destruction efficiency, as determined by tests conducted on April 10, 2001, of the RTO is 99.3%. The design process flow and equipment specifications for the RTO are summarized in the following table.

Process Flow Rate	27,000 SCFM
Oxidizer Inlet Temperature	80°F
Oxidizer Outlet Temperature	229°F
Oxidation Temperature	1,600°F
Estimated Solvent Composition Rate	367 lb/hr
Heating Value of Solvent	12,000 BTU/lb
Net Energy from Solvent	4.4 MMBTU/hr
Energy Required	0 MMBTU/hr
Energy Cost @ \$5.00/MMBTU	0
Fan Horsepower	75 hp
Fan Energy Usage	56 KW
Fan Energy Cost @ \$0.06/KWH	\$3.36

Source: Title V Air Operating Permit Application, dated February 2002, prepared by Golder Associates, Inc.

If you have any questions or require additional information, please do not hesitate to contact one of us at CRB at (305) 447-9777 or Nailite International at (305) 620-6200 Ext. 241.

Sincerely,



Victor Rossinsky, Jr., Ph.D., P.G.
CRB Geological & Environmental
Services, Inc.
Senior Project Manager

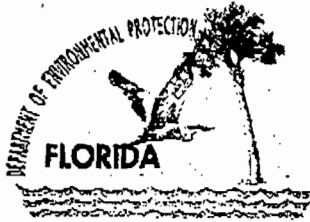


John E. Perry
Nailite International
Vice President of Operations
Title V Permit Responsible Official

Attachments

ATTACHMENT I

REGULATORY CORRESPONDENCE



Best Available Copy
Department of
Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 5, 2002

To the Title V Air Permitting Contact Person:

Our records indicate that your facility may be a major source of hazardous air pollutants and may be in the affected Plastic Parts (Surface Coating) source category. Therefore, you must notify us by May 15, 2002 if you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category. A list of affected industry type source categories is printed on the reverse side of this letter.

The Clean Air Act (CAA), as amended in 1990, requires that the USEPA publish federal regulations by May 15, 2002 to determine the maximum achievable control technology (MACT) to reduce emissions of hazardous air pollutants (HAPs) from certain industry type source categories at facilities that emit major amounts of hazardous air pollutants. A major amount of hazardous air pollutants is considered to be 10 tons per year or more of a single hazardous air pollutant, or 25 tons per year or more of a combination of hazardous air pollutants. However, the USEPA is not likely to publish the federal MACT regulations until May 15, 2004 instead of May 15, 2002, the MACT "hammer" date. As a result, Section 112(j) of the Clean Air Act must be initiated.

If you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category, you must submit to our office and the USEPA by May 15, 2002 the following 112(j) notification information, which may be in letter format:

- (1) The name, address (physical location), and brief description of the major source (facility);
(2) An identification of the relevant industry type source category(ies) [See list on reverse side of this letter.];
(3) A list of the emission units belonging to the relevant industry type source category(ies); and
(4) An identification of any affected sources for which a section 112(g) MACT determination has been made.

This submittal must be signed by the Title V permit Responsible Official. The mailing addresses for the 112(j) contacts at our office and the USEPA are:

Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

This notification requirement does not affect the processing of any Title V permits that are undergoing renewal now or in the near future. Any newly applicable NESHAP requirements that may be promulgated by May 2004 will be incorporated into your Title V permit through the procedures specified in 40 CFR 70.7 (f), Reopening for cause. As before, any new construction or reconstruction that, by itself, will emit a major amount of hazardous air pollutants, will likely require a 112(g) Case-by-case MACT determination during the construction permitting process.

If you have any questions, please contact Ms. Cindy Phillips at 850-921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,

Scott M. Sheplak, P.E. Administrator
Title V Section, Bureau of Air Regulation

Florida Department of Environmental Protection

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AFFECTED INDUSTRY TYPE SOURCE CATEGORIES

NESHAP NOT PROPOSED YET

- Auto & Light Duty (Surface Coating)
- Brick & Structural Clay Products Mfg.
- Combustion Turbines
- Fabric Printing, Coating, and Dyeing
- Industrial, Commercial and Institutional Boilers and Indirect-fired Process Heaters
- Iron Foundries
- Lime Manufacturing
- Mercury Cell Chlor-Alkali Plants
- Metal Can (Surface Coating)
- Metal Furniture (Surface Coating)
- Misc. Metal Parts and Products (Surface Coating)
- Misc. Organic Chemical Production and Processes (MON)
- Organic Liquids Distribution (non-gasoline)
- Paint Stripping Operations
- Plastic Parts (Surface Coating)
- Plywood and Composite Wood Products
- Primary Magnesium Refining
- Reciprocating Internal Combustion Engines (RICE)
- Refractory Products Manufacturing
- Rocket Testing Facilities & Engine Test Cells/Standards
- Semiconductor Production
- Site Remediation
- Taconite Iron Ore Processing
- Wood Building Products (Surface Coating)

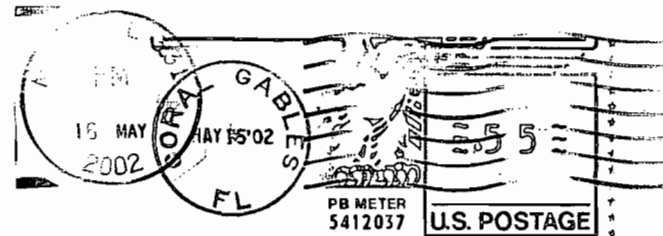
NESHAP PROPOSED BUT NOT FINAL YET

- Asphalt Roofing & Processing
- Cellulose Ethers Production Manufacturing
- Coke Oven: Pushing, Quenching, & Battery Stacks
- Flexible Polyurethane Foam Fabrication Operation
- Friction Materials Manufacturing
- Generic MACT
- Hydrochloric Acid Production
- Integrated Iron & Steel
- Large Appliance (Surface Coating)
- Metal Coil (Surface Coating) Industry
- Miscellaneous Viscose Processes
- Municipal Solid Waste Landfills
- Paper & Other Web (Surface Coating)
- Petroleum Refineries
- Polyvinyl Chloride and Copolymers Production
- Primary Copper
- Reinforced Plastics Products Manufacturing
- Tire Manufacturing
- Wet-Formed Fiberglass Mat Production



CRB

GEOLOGICAL & ENVIRONMENTAL SERVICES, INC.
4573 PONCE DE LEON BLVD.
CORAL GABLES, FLORIDA 33146



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