

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File Nos. AC 42-176008
AC 42-176009
Marion County

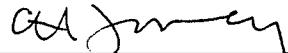
Mr. Roy T. Boyd III
Chief Executive Officer
Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675

Enclosed are Permit Numbers AC 42-176009 and AC 42-176009 to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations at the Mark III Industries facility in Ocala, Marion County, Florida. These permits are issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permits pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 5-13-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

5-13-92
(Date)

Copies furnished to:

B. Thomas, Southwest District
D. Gaboardi, Mark III Industries
L. Stebbins, P.E., Missimer & Associates

Final Determination

Mark III Industries
Marion County
Ocala, Florida

Construction Permit Nos.
AC 42-176008
AC 42-176009

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

May 8, 1992

Final Determination

The construction permit application packages and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Ocala Star-Banner on April 20, 1992. The Technical Evaluation and Preliminary Determination was distributed on April 16, 1992, and available for public inspection at the Department's Central District office and the Department's Bureau of Air Regulation office.

There were no comments received during the public notice period. Therefore, it is recommended that the construction permits be issued as drafted.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

**Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675**

Permit Number: AC 42-176008

Expiration Date: Dec. 30, 1993

County: Marion

**Latitude/Longitude: 29°11'00"N
82°15'24"W**

**Project: Ultraviolet Reactor Room
Operations**

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modifications to the existing Ultraviolet Reactor Room (UVR) operations, which includes installing a new spray gun apparatus and overspray collection and recovery system and increasing the allowable VOC (volatile organic compounds/organic solvents) emissions.

The UTM coordinates are Zone 17, 377.81 km East and 3228.77 km North.

The Standard Classification Codes are:

- o 4-02-021-01 Base Coat (tons solvent in coating)
- o 4-02-021-06 Top Coat (tons solvent in coating)
- o 4-02-021-08 Sealer (tons solvent in coating)
- o 4-02-021-53 UV Coating (10³ ft² production surface area)

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received February 1, 1990.
2. Mr. C. H. Fancy's letter dated March 2, 1990.
3. Mr. Roy T. Boyd, III's letter and supplementary information received March 30, 1992.
4. Technical Evaluation and Preliminary Determination dated April 15, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Ultraviolet Reactor Room (UVR) operations shall not exceed 28.5 lbs/hr; 125.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-2.610(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
6. The UVR operations are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The UVR operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-2.700(2)(a). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

SPECIFIC CONDITIONS:

9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
- Initial inventory of all VOCs;
 - Deliveries of all VOC material after the initial inventory;
 - Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;
 - Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
 - Emissions must be verifiable on a monthly basis.

NOTE: It will be assumed that any VOCs used and not accounted for by recycling or collected and shipped to an approved waste handling facility were emitted into the atmosphere.

10. An annual report shall be submitted to the Department's Southwest District office by March 1 of each calendar year accounting for the VOC emissions from the UVRP operations.

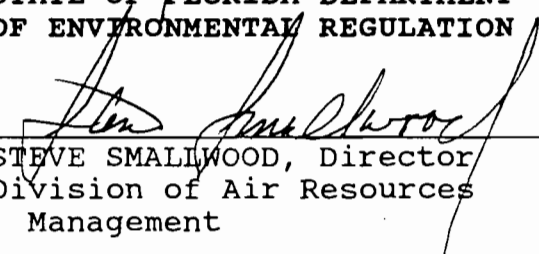
11. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.

12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

13. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, processing fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 12th day
of May, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


STEVE SMALLWOOD, Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

**Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675**

**Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993
County: Marion
Latitude/Longitude: 29°11'00"N
82°15'24"W**

**Project: Paint Spray Booth
Operations**

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modifications to the existing Paint Spray Booth (PSB) operations, which includes installing a new computer controlled spray gun system, which will replace four existing PSBs, and a decrease in the allowable VOC (volatile organic compounds/organic solvents) emissions. Previously, there were 22 operational PSBs.

The UTM coordinates are Zone 17, 377.81 km East and 3228.77 km North.

The Standard Classification Codes are:

o 4-02-016-31 Topcoat (# of vehicles processed)

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received February 1, 1990.
2. Mr. C. H. Fancy's letter dated March 2, 1990.
3. Mr. Roy T. Boyd, III's letter and supplementary information received March 30, 1992.
4. Technical Evaluation and Preliminary Determination dated April 15, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Paint Spray Booth (PSB) operations shall not exceed 22.8 lbs/hr; 100.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-2.610(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
6. The PSB operations are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The PSB operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-2.700(2)(a). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

SPECIFIC CONDITIONS:

9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
- Initial inventory of all VOCs;
 - Deliveries of all VOC material after the initial inventory;
 - Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;
 - Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
 - Emissions must be verifiable on a monthly basis.

NOTE: It will be assumed that any VOCs used and not accounted for by recycling or collected and shipped to an approved waste handling facility were emitted into the atmosphere.

10. An annual report shall be submitted to the Department's Southwest District office by March 1 of each calendar year accounting for the VOC emissions from the PSB operations.

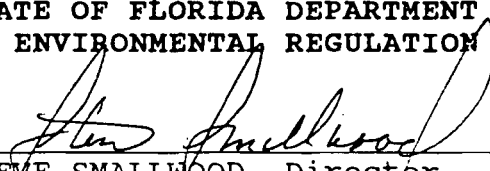
11. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.

12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

13. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, processing fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 12th day
of May, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



STEVE SMALLWOOD, Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 15, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Roy T. Boyd III
Chief Executive Officer
Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675

Dear Mr. Boyd:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Mark III Industries to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/rbm

Attachments

c: B. Thomas, SWD
D. Gaboardi, M3I
L. Stebbins, P.E., M&A, Inc.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Applications for Permits by:

Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675

DER File Nos. AC 42-176008
AC 42-176009

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed projects, as detailed in the applications specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Mark III Industries, applied on February 1, 1990, to the Department of Environmental Regulation for permits to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations. The proposed projects will occur at the applicant's existing facility located in Ocala, Marion County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permits. 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, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

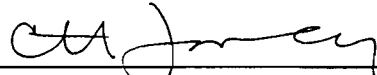
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a

hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation


Copies furnished to:

- B. Thomas, SWD
- D. Gaboardi, M3I
- L. Stebbins, P.E., M&A, Inc.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 4-16-92.

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

4-16-92
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

AC 42-176008: Ultraviolet Reactor Room Operations
AC 42-176009: Paint Spray Booth Operations

The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Mark III Industries, 5401 N.W. 44th Avenue, Ocala, Florida 32675, to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations. The proposed projects will occur at the applicant's existing facility in Marion County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Mark III Industries
Marion County
Ocala, Florida

Construction Permit Nos.
AC 42-176008
AC 42-176009

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

April 15, 1992

I. Application

A. Applicant

Mark III Industries
5401 NW 44th Avenue
P. O. Box 2525
Ocala, Florida 32678

B. Project

The applicant intends to modify the existing Ultraviolet Reactor Room (UVR) and Paint Spray Booth (PSB) operations by installing some new equipment and increasing the allowable pollutant emissions (UVR). In the UVR operations, a new spray gun apparatus and overspray collection and recovery system will be installed. In the PSB operations, a new computer controlled spray gun system will be installed, which will replace four existing PSBs; also, there is an associated LP gas oven as part of the new system. The proposed modifications will take place at the applicant's existing facility in Marion County.

The UTM coordinates are Zone 17, 377.81 km East and 3228.77 km North.

C. Process and Controls

1. UVR Operations

Sheets of hardwood paneling are coated to protect and enhance the appearance of the wood. Parts are loaded onto a conveyor belt. The conveyor passes the parts under a photo cell, which determines the size of the parts. Data is fed into the computer, which controls the reciprocating sprayers. The parts then enter the coating spray booth and coated by the automatic sprayers. Approximately thirty percent of the overspray is captured and recycled. Next, the parts pass through a flash tunnel and enter a UV curing oven. The parts are sanded and sent through a second similar process. After a second pass, the parts are sanded and sent through the process again, and coated with a final topcoat.

There are no outside controls associated with the UVR operations.

2. PSB Operations

Custom body parts are painted to match the color of vans received from the factory and then attached to the vans. In the proposed new system, the parts will be loaded onto a conveyor belt and pass under a photo cell, which will determine the size of each part. Data will be fed into a computer, which will program the reciprocating sprayers. The parts will enter a spray booth, where

a base coat is applied by automatic sprayers. After passing through a flash tunnel, the parts will enter a second spray tunnel prior to entering the oven. In the oven, the paint will be baked onto the parts, after which they will be ready for final assembly. Also, exterior van body parts can be painted by manually operated sprayers within an existing PSB.

There are no outside controls associated with the PSB operations.

D. Source Classification Codes (SCC)

The SCC for this operation are:

- o 4-02-021-01 Base Coat (tons solvent in coating)
- o 4-02-021-06 Top Coat (tons solvent in coating)
- o 4-02-021-08 Sealer (tons solvent in coating)
- o 4-02-021-53 UV Coating (10^3 ft² production surface area)
- o 4-02-016-31 Topcoat (# of vehicles processed)

II. Rule Applicability

The project is subject to preconstruction review pursuant to Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4.

The application packages were deemed complete on March 30, 1992.

The existing facility is located in an area designated attainment for all pollutants.

The existing facility is major for volatile organic compounds (VOCs) and minor for particulate matter.

The existing UVRP operations were permitted for a total of 22.6 TPY VOCs; and, the proposed new limit is 125 TPY VOCs. The existing PSB operations were permitted for a total of 107.8 TPY VOCs; and, the proposed new limit is 100.0 TPY VOCs.

Since the modifications, as a total, would be a minor modification to a major facility, the VOC emissions are subject to review in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration (PSD) or Nonattainment Requirements.

There are no specific source emission limiting standards pursuant to F.A.C. Rules 17-2.600 or 17-2.660. Therefore, the UVRP and PSB operations are subject to emission limiting standards pursuant to F.A.C. Rules 17-2.610(2), General Visible Emissions Standard, and F.A.C. Rule 17-2.620(1) and (2), General Pollutant Emission Limiting Standards.

The UVRR and PSB operations are subject to F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

A material balance scheme will continue to be employed to account for the VOC emissions from the UVRR and PSB operations. An annual operation report will be required and due by March 1 of each calendar year. The report is to be submitted to the Department's Southwest District.

Initial and annual compliance tests for visible emissions shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-2.700(2)(a). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

III. Summary of Emission Limitations and Air Quality Analysis

A. Emission Limitations

Limitations for VOCs emissions and visible emissions applicable to the UVRR and PSB operations as follows:

Table 1

Source	Pollutant	Maximum Allowable Emission Limitation
UVRR Operations	VOCs	28.5 lbs/hr; 125.0 TPY (total)
	VE	less than 20% opacity
PSB Operations	VOCs	22.8 lbs/hr; 100.0 TPY (total)
	VE	less than 20% opacity

Note: Allowed continuous operation (i.e., 24 hrs/day, 7 days/wk, 52 wks/yr).

B. Air Quality Analysis

From a review of the application package and supplementary material, an air quality analysis was not required.

IV. Conclusion

The emission limiting standards are in compliance with F.A.C. Chapter 17-2. The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all requirements of F.A.C. Chapters 17-2 and 17-4.

Based on the information provided by Mark III Industries, the Department has reasonable assurance that the proposed modification to the UVRR and PSB operations, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

[Handwritten signature]
PE # 41755



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

**Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675**

**Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993
County: Marion
Latitude/Longitude: 29°11'00"N
82°15'24"W**

**Project: Ultraviolet Reactor Room
Operations**

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modifications to the existing Ultraviolet Reactor Room (UVR) operations, which includes installing a new spray gun apparatus and overspray collection and recovery system and increasing the allowable VOC (volatile organic compounds/organic solvents) emissions.

The UTM coordinates are Zone 17, 377.81 km East and 3228.77 km North.

The Standard Classification Codes are:

- o 4-02-021-01 Base Coat (tons solvent in coating)
- o 4-02-021-06 Top Coat (tons solvent in coating)
- o 4-02-021-08 Sealer (tons solvent in coating)
- o 4-02-021-53 UV Coating (10³ ft² production surface area)

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received February 1, 1990.
2. Mr. C. H. Fancy's letter dated March 2, 1990.
3. Mr. Roy T. Boyd, III's letter and supplementary information received March 30, 1992.
4. Technical Evaluation and Preliminary Determination dated April 15, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Ultraviolet Reactor Room (UVR) operations shall not exceed 28.5 lbs/hr; 125.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-2.610(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
6. The UVR operations are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The UVR operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-2.700(2)(a). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176008
Expiration Date: Dec. 30, 1993

SPECIFIC CONDITIONS:

9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
- a. Initial inventory of all VOCs;
 - b. Deliveries of all VOC material after the initial inventory;
 - c. Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;
 - d. Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
 - e. Emissions must be verifiable on a monthly basis.

NOTE: It will be assumed that any VOCs used and not accounted for by recycling or collected and shipped to an approved waste handling facility were emitted into the atmosphere.

10. An annual report shall be submitted to the Department's Southwest District office by March 1 of each calendar year accounting for the VOC emissions from the UVRP operations.

11. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.

12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

13. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, processing fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1992

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

STEVE SMALLWOOD, Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993
County: Marion
Latitude/Longitude: 29°11'00"N
82°15'24"W

Project: Paint Spray Booth
Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For modifications to the existing Paint Spray Booth (PSB) operations, which includes installing a new computer controlled spray gun system, which will replace four existing PSBs, and a decrease in the allowable VOC (volatile organic compounds/organic solvents) emissions. Previously, there were 22 operational PSBs.

The UTM coordinates are Zone 17, 377.81 km East and 3228.77 km North.

The Standard Classification Codes are:

- o 4-02-016-31 Topcoat (# of vehicles processed)

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received February 1, 1990.
2. Mr. C. H. Fancy's letter dated March 2, 1990.
3. Mr. Roy T. Boyd, III's letter and supplementary information received March 30, 1992.
4. Technical Evaluation and Preliminary Determination dated April 15, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Paint Spray Booth (PSB) operations shall not exceed 22.8 lbs/hr; 100.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-2.610(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
6. The PSB operations are subject to the provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The PSB operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-2.700(2)(a). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

PERMITTEE:
Mark III Industries

Permit Number: AC 42-176009
Expiration Date: Dec. 30, 1993

SPECIFIC CONDITIONS:

9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
- a. Initial inventory of all VOCs;
 - b. Deliveries of all VOC material after the initial inventory;
 - c. Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;
 - d. Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
 - e. Emissions must be verifiable on a monthly basis.

NOTE: It will be assumed that any VOCs used and not accounted for by recycling or collected and shipped to an approved waste handling facility were emitted into the atmosphere.

10. An annual report shall be submitted to the Department's Southwest District office by March 1 of each calendar year accounting for the VOC emissions from the PSB operations.

11. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.

12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

13. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, processing fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1992

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

STEVE SMALLWOOD, Director
Division of Air Resources
Management

Attachments Available Upon Request

**APPLICATION TO CONSTRUCT
AIR POLLUTION SOURCE**

Prepared for:
Mark III Industries
5401 NW 44th Avenue
Ocala, Florida 32675

RECEIVED

MAR 30 1992

Division of Air
Resources Management

Prepared by:
Missimer & Associates, Inc.
8130 Baymeadows Way West, Suite 104
Jacksonville, Florida 32256

March 20, 1992

M&A Project No. JE1-448

Control No. 895



March 26, 1992

Mr. Clair H. Fancy, P.E.
Florida Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Subject: **Construction Permit Application
Mark III Industries, Ocala, Florida**

Dear Mr. Fancy:

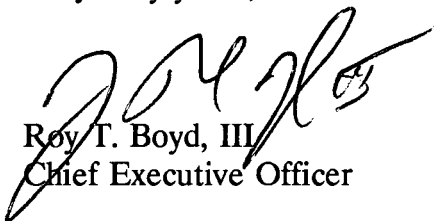
Concurrent with our continuing growth has been the good fortune of developing a series of innovative approaches for reducing VOC emissions per vehicle. We greatly appreciate the Departments cooperation in facilitating both as we endeavor to meet or exceed all applicable regulatory requirements.

As part of our ongoing efforts, we have directed our consultant to prepare the accompanying permit application for the construction of surface coating operations in the Cabinet Shop and paint shops at the Ocala facility. The emissions from the processes will consist of volatile organic compounds (VOCs) vented to the atmosphere.

We are and have been committed to protecting the environment for the benefit of our employees and the surrounding community. We are sensitive to environmental issues and take every effort to maintain compliance with all environmental laws and regulations.

We would like to permit this source as quickly as possible to avoid operational disruptions. For this reason, we would sincerely appreciate your assistance in expediting the review process. If you have any questions, please contact me or our consultant, Lloyd Stebbins, Missimer & Associates, Inc., at (904) 448-6400.

Very truly yours,



Roy T. Boyd, III
Chief Executive Officer

cc: Bruce Mitchell, FDER
G. McDonald, SW Dept.

448.895

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APPLICANT'S LETTER

TABLE OF CONTENTS

CONSULTANT'S LETTER

APPLICATION TO CONSTRUCT AIR POLLUTION SOURCE

- (Surface Coating Wood Paneling)

APPLICATION TO CONSTRUCT AIR POLLUTION SOURCE

- (Paint Spray Booths)

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Process Description

- Surface Coating Wood Paneling
- Paint Spray Booths

ATTACHMENT 2: Section V

Supplemental Requirements

- Surface Coating Wood Paneling
- Paint Spray Booths

ATTACHMENT 3: Overspray Collection and Recovery Equipment Brochure

ATTACHMENT 4: Process Flow Diagram, Cabinet Shop

ATTACHMENT 5: Process Flow Diagram, Paint Shops

ATTACHMENT 6: Site Location Map

ATTACHMENT 7: Plot Plan



MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Services

Suite 104
8130 Baymeadows Way West
Jacksonville, Florida 32256

(904) 448-6400
Fax (904) 448-8556

March 26, 1992

Mr. Clair H. Fancy, P.E.
Florida Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Subject: **Application to Construct Air Pollution Source
Mark III Industries, Ocala, Florida
M&A Project No. JE1-448, Control No. 895**

Dear Mr. Fancy:

The enclosed construction permit application package has been prepared for the Cabinet Shop and the paint spray booths at Mark III Industries customized van assembly plant in Ocala, Florida. It is intended to update and replace the original construction permit application submitted on August 23, 1988 and the modification submitted on January 29, 1990. A check for \$250 is enclosed in accordance with 17-4.050(4)(a) FAC for processing the application.

The emissions consist entirely of VOC's. The sources of the emissions are the surface coating of wood paneling in the Cabinet Shop and the paint spray booths in two paint shops.

Mark III Industries has continuously developed new technologies which are more efficient and effective at reducing the emissions of VOCs per vehicle. A chronology of these efforts is provided as an indication of the remarkable success that Mark III Industries has achieved.

Mark III Industries is currently operating under two construction permits, one for the cabinet shop and one for the paint shops, which expire on June 30, 1992. They are currently planning the installation of equipment in the Cabinet Shop and paint shops operations which is even more efficient than previous upgrades. To facilitate the improvements, Mark III Industries is requesting that the current permits each be granted one year extensions so that the new equipment can be installed.

The plant is located in an attainment area for VOCs. Since it is a minor source, PSD does not apply. Moreover, there are no NSPS or NESHAPS standards that apply.

Mr. Clair H. Fancy
March 26 1992
Page 2

Indeed, Mark III Industries is located in a rural area with virtually no significant nearby emitters.

The new spray application system will include electronic reciprocator sprayers to replace the manual sprayers currently used. The computerized system will improve the transfer efficiency of the woodcoating system by approximately 10% thus reducing the overspray. Further, an overspray collection and recovery system will be installed in the Cabinet Shop spray booths designed to recapture up to 30% of the airborne VOCs. Since the new facilities will dramatically reduce emissions per vehicle, we would greatly appreciate your efforts to expedite processing of the application.

Because of the irregular production scheduling and the continuing and rapid succession of technological improvements, the VOC emissions from the plant can be monitored most reliably by tracking the consumption of coating materials and conservatively assuming that all VOCs in the coating are emitted. Accordingly, we request that the specific conditions in the permit support that approach.

If you have any questions or require additional information, please feel free to contact us.

Sincerely,

MISSIMER & ASSOCIATES, INC.

Lloyd H Stebbins /kk

Lloyd H. Stebbins, P.E., DEE
Corporate Vice President
Industrial Services
Professional Engineer #31838

cc: Bruce Mitchell

**CHRONOLOGY OF MARK III INDUSTRIES EFFORTS
TO REDUCE VOC EMISSIONS**

1990

<u>March</u>	VOC reduction team set-up.
<u>June</u>	Mark III begins ordering low VOC base maker. Mark III purchase new spray guns.
<u>July</u>	Refit new spray guns.
<u>August</u>	Purchase more new spray guns.
<u>December</u>	Order switch to waterborne stain.

1991

<u>February</u>	Begin using graphics instead of paint.
<u>August</u>	Switch to darker wood to reduce amount of stain used.

Mark III Industries has conducted extensive research into the development of new materials and more efficient equipment. They have coordinated their efforts with both manufacturers and suppliers.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



AC42-176008

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Surface Coating Wood Panelling New Existing

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Mark III Industries COUNTY: Marion

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) U.V. Reactor Room

SOURCE LOCATION: Street 5401 N.W. 44th Avenue City Ocala

UTM: East 384.00 North 3235.54

Latitude 29 ° 14 ' 43 " N Longitude 82 ° 11 ' 33 " W

APPLICANT NAME AND TITLE: Roy T. Boyd, III, Chief Executive Officer

APPLICANT ADDRESS: 5401 N.W. 44th Avenue, Ocala, Florida 32675

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Mark III Industries

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

Roy T. Boyd, III, Chief Exec. Officer
Name and Title (Please Type)

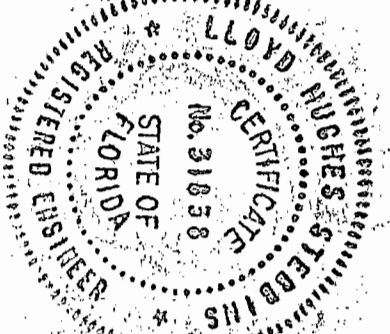
Date: 3-27-92 Telephone No. 904 732-5878

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed [Signature]

Lloyd H. Stebbins, P.E.
Name (Please Type)

Missimer & Associates, Inc.
Company Name (Please Type)

8130 Baymeadows Way, Ste. 104, Jacksonville, FL 32256
Mailing Address (Please Type)

Florida Registration No. 31838 Date: 3/24/90 Telephone No. 904 448-6400

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Hardwood panels are coated with a sealer/topcoat to protect and enhance the appearance. Sealer/topcoat is a monomer polymerized by ultraviolet light. See Attachment for a more detailed process description.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction August 23, 1988 Completion of Construction June 30, 1993

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$100,000.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC-154375 Expiration June 30, 1992

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;
if power plant, hrs/yr N/A; if seasonal, describe: 8760 hrs/yr

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
 - a. If yes, has "offset" been applied? N/A
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
 - c. If yes, list non-attainment pollutants. N/A
 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No
 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No
 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No
 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No
- a. If yes, for what pollutants? N/A
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
TopCoat *	voc	67.8	42.1	See Supp. Information

* Surrogate for worst case scenario

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 42.1 lb/hr
2. Product Weight (lbs/hr): 13.6 lb/hr

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
voc *	28.5	125	N/A	N/A	250,000	125	See Supp. Information

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

* Values represent the total emissions

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Overspray Collection System	voc	30%	N/A	See Attachment 3

E. Fuels N/A

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: N/A

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

None

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 36 ft. Stack Diameter: 1.5 ft.
 Gas Flow Rate: 6000 ACFM 6000 DSCFM Gas Exit Temperature: Ambient °F.
 Water Vapor Content: Ambient % Velocity: 56.6 FPS

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
 - a. (1) Company:
 - (2) Mailing Address:
 - (3) City:
 - (4) State:

Explain method of determining efficiency.
 Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

N/A

1. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/di:

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2800 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



AC42-176009

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Paint Spray Booths New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Mark III Industries COUNTY: Marion

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired)

SOURCE LOCATION: Street 5401 N.W. 44th Avenue City Ocala

UTM: East 384.00 North 3235.54

Latitude 29 ° 14 ' 43 "N Longitude 82 ° 11 ' 33 "W

APPLICANT NAME AND TITLE: Roy T. Boyd III, Chief Executive Officer

APPLICANT ADDRESS: 5401 N.W. 44th Avenue, Ocala, Florida 32675

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Mark III Industries

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]
Roy T. Boyd, III, Chief Exec. Officer
Name and Title (Please Type)

Date: 3-27-92 Telephone No. 904-732-5878

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

See Florida Administrative Code Rule 17-2.100(57) and (104)

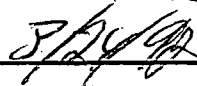
the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

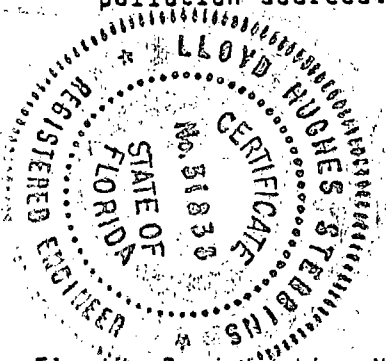
Signed 

Lloyd H. Stebbins, P.E.
Name (Please Type)

Missimer & Associates, Inc.
Company Name (Please Type)

8130 Baymeadows Way, Ste. 104, Jacksonville
Mailing Address (Please Type) FL. 32256

Florida Registration No. 31838 Date:  Telephone No. 904-448-6400



SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Painted vehicles received from the factory are equipped with
customized interiors and repainted. See attachment for a
more detailed process description.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction August 23, 1988 Completion of Construction June 30, 1993

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC42-154393, Expiration June 30, 1992

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;
if power plant, hrs/yr N/A; if seasonal, describe: 8760 hrs/yr

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
 - a. If yes, has "offset" been applied? N/A
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
 - c. If yes, list non-attainment pollutants. N/A
 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No
 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No
 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No
 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No
- a. If yes, for what pollutants? N/A
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Basemaker *	voc	99.9%	22.9	See Supp. Info

* Surrogate for worst case scenario

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 22.9 lb/hr

2. Product Weight (lbs/hr): 0.1 lb/hr

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
voc	22.8	100	N/A	N/A	200,000	100	See Supp Info
SO ₂	0.00026	0.001	N/A	N/A	0.00026	0.001	
NO _x	0.027	0.12	N/A	N/A	0.027	0.12	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
LP Gas	2.20 gal/hr**	2.93 gal/hr	0.2754 (units)

Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

** Estimated

Fuel Analysis:

N/A

Percent Sulfur: 0.09 lb/10³ Gal Percent Ash: 0.26 lb/10³ Gal

Density: _____ lbs/gal Typical Percent Nitrogen: 9.1 lb NO_x/10³ Gal

Heat Capacity: _____ BTU/lb 93,950 BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

. Indicate liquid or solid wastes generated and method of disposal.

None

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 36 ft. Stack Diameter: 1.5 ft.
 Gas Flow Rate: 4100 ACFM 4100 DSCFM Gas Exit Temperature: Ambient °F.
 Water Vapor Content: Ambient % Velocity: 38.7 FPS

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, wash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:

4. Capital Costs:

Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹ Explain method of determining efficiency.

Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION N/A

Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂ _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

- F. Attach all other information supportive to the PSD review.
- G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.
- H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT I
Section II A
Process Description

ATTACHMENT 1
Section II A
Process Description

Surface Coating Wood Paneling

Sheets of hardwood paneling are coated to protect and enhance the appearance of the wood. Parts are loaded onto a conveyor belt. The conveyor passes the parts under a photo cell which determines the size of the parts. Data is fed into the computer which controls the reciprocating sprayers. The parts then enter the coating spray booth and coated by the automatic sprayers. Thirty percent of the overspray is captured and recycled. Next, the parts pass through the flash tunnel and enter the U.V. curing oven. The parts are sanded and sent through a second similar process. After the second pass, the parts are sanded and sent through the process again, and coated with the final topcoat.

Paint Spray Booths

Custom body parts are painted to match the color of vans received from the factory then attached to the vans. Parts are loaded onto a conveyor belt and pass under a photo cell which determines the size of each part. Data is fed into a computer which programs the reciprocating sprayers. The parts enter a spray booth where a base coat is applied by the automatic sprayers. After passing through a flash tunnel the parts enter a second spray booth and are painted by the automatic sprayers. The parts pass through another flash tunnel before entering the oven. In the oven, the paint is baked onto the parts after which they are ready for final assembly.

Exterior van body parts can also be painted by manually operated sprayers. Vans are parked in a spray booth. The areas to be painted on the van body are masked off and painted. The paint is allowed to flash after which additional coats are applied as needed. The finish coat is then baked on.

ATTACHMENT 2
Section V
Supplemental Requirements

Section V: Supplemental Requirements - Surface Coating Wood Paneling

1,2,3. The wood surface coating operations utilize several different materials which contain VOC's. To simplify the calculations, the properties of the top coat (TC) material are used as a surrogate for the other materials used in the operation. This represents a worst case scenario because the top coat has the highest concentration of VOC's of the materials used in the wood surface coating operation.

Utilization Rate:

$$(42.1 \text{ lb TC/hr})(67.8\% \text{wt VOC}) = 28.5 \text{ lb VOC/hr}$$

$$(28.5 \text{ lb VOC/hr})(8760 \text{ hr/yr}) / 2000 \text{ lb/ton} = 125 \text{ ton VOC/yr}$$

4,5. No air pollution control equipment is used in the operation of the wood surface coating process. Mark III Industries is currently in the process of changing the spray gun apparatus and overspray collection equipment in the spray booths. The new spray gun equipment is computer controlled and reduces the amount of overspray, reducing the amount of material used in the coating process and reducing VOC emissions. The overspray equipment captures the overspray by causing the exhaust to rapidly change direction by directing it through a spiral path. All of the overspray that is collected is recycled. A copy of the brochure describing the equipment is included as Attachment 3.

- 6.** Process flow diagram - See Attachment 4.
- 7.** Site location map - See Attachment 6.
- 8.** Plot plan - See Attachment 7.
- 9.** Application fee - \$125.00
- 10.** Certificate of Completion - Not applicable.

Section V: Supplemental Requirements - Paint Spray Booths

1,2,3. Several materials which contain varying amounts of VOC's are utilized in the spray booths during the painting process. To simplify calculations, the properties of the basemaker (BM) are used as a surrogate for the other materials. The basemaker is used as an ingredient in the basecoat. This represents a worst case scenario because the basemaker has the highest concentration of VOC's of all the materials used in the paint spray booths.

Utilization Rate:

$$(22.9 \text{ lb BM/hr})(99.9\% \text{wt VOC}) = 22.8 \text{ lb VOC/hr}$$

$$(22.8 \text{ lb VOC/hr})(8760 \text{ hr/yr}) / 2000 \text{ lb/ton} = 100 \text{ ton VOC/yr}$$

4,5. No air pollution control devices are utilized in the paint spray booths. Mark III Industries is currently proposing the installation of a new computer controlled spray gun system which will replace four paint spray booths. This new system will reduce the amount of overspray during the painting process. Because the computer controlled spray guns reduce the amount of overspray, the total amount VOC emissions will be reduced.

6. Process flow diagram - See Attachment 5.
7. Site location map - See Attachment 6.
8. Plot plan - See Attachment 7.
9. Application fee - \$125.00
10. Certificate of Completion - Not applicable.

ATTACHMENT 3
Overspray Collection Equipment

BEST AVAILABLE COPY

WE BUILD BETTER PAINT TRAPS.

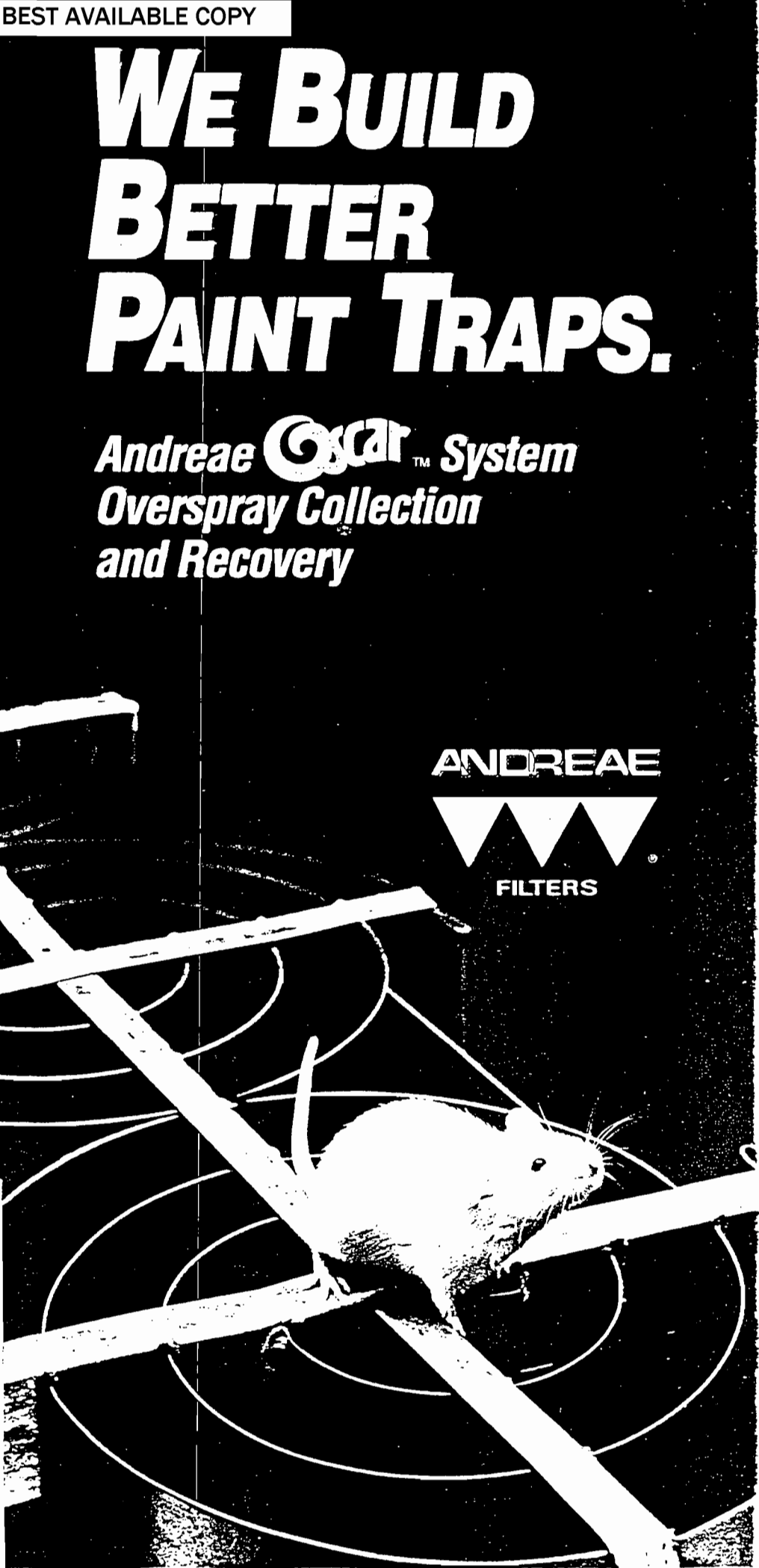
*Andreae **Oscar**™ System
Overspray Collection
and Recovery*

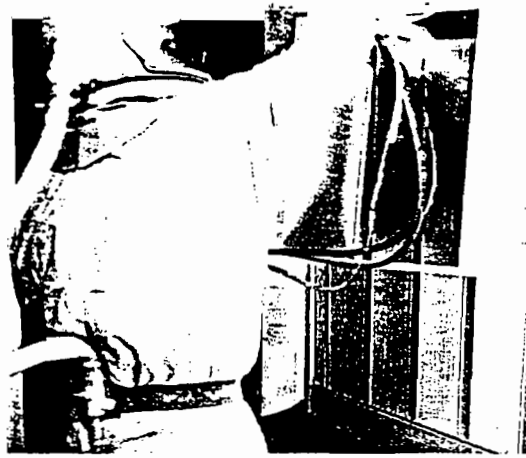
ANDREA E



FILTERS

THE NEW OSCAR SYSTEM
is a revolutionary
method for
overspray collection
and recovery.
It is the most
effective and
efficient system
available today.
It is the only
system that
can be used
on any type of
paint.





Oscar SYSTEM™

The Oscar System Concentric Spiral Baffle Collector.

Containing no moving parts and requiring no maintenance, this amazing device generates increasing centrifugal force on each overspray particle as it moves through the tightening spiral, causing paint to be collected on its interior walls for recovery and re-use.

- ▼ Automatic recovery of up to 99% of overspray for disposal or recycling
- ▼ Filter change intervals lengthened from hours to months
- ▼ Back section, fan and stack maintenance costs virtually eliminated
- ▼ VOC emissions reduced by 25%
- ▼ Air stream leaving the Oscar System and plant exhaust stack is virtually free of overspray

Now There's a Better Way.

Andreae Filters Oscar System Provides These High-Performance Benefits:

- ▼ Uniform air flow across booth opening

Oscar Can Be Retrofitted Into Most Water-Wash or Dry Filter Booths Over a Single Weekend!

REDUCE BOOTH MAINTENANCE COST BY 33%.

Andreae Filters, Inc. Oscar System is the Best Available Technology for the Capture and Recovery of High Solids, Radiation-Cured and Selected Other Non-Air Dry Coatings Overspray.

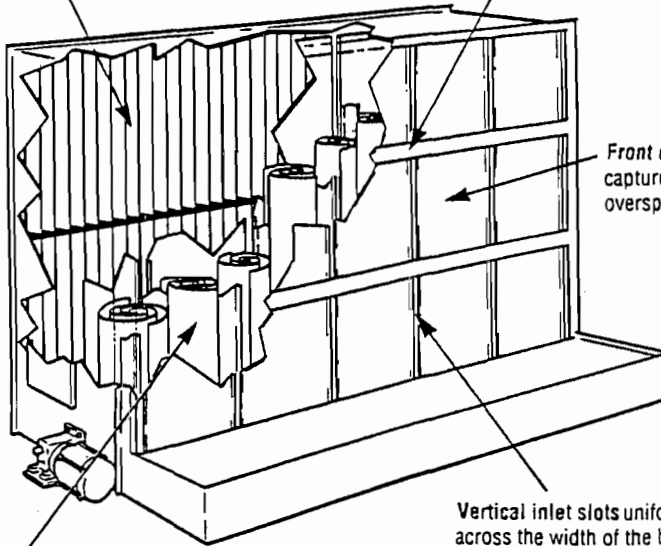
A Revolutionary, New Overspray Collection and Paint Recovery Technology!

Historically, the operating efficiency and effectiveness of paint spray booth operations have been limited by a variety of factors including:

- ▼ Non-uniform air flow
- ▼ Excessive maintenance
- ▼ Frequent filter changes
- ▼ Labor-intensive water tank clean-outs
- ▼ Wasting expensive paint
- ▼ Periodic back section, fan and stack clean-outs
- ▼ Rapidly escalating waste disposal costs

Andreae HE Filter removes up to 99.6% of all remaining overspray for better than 99.9% overall system efficiency

Unit Frame. Designed to be retrofitted into your existing water wash or dry filter booths. (Consult adjacent chart for fan requirements)



Front collecting plate captures up to 70% of overspray for recovery

Vertical inlet slots uniformly spaced across the width of the booth provide uniform air flow across the booth opening

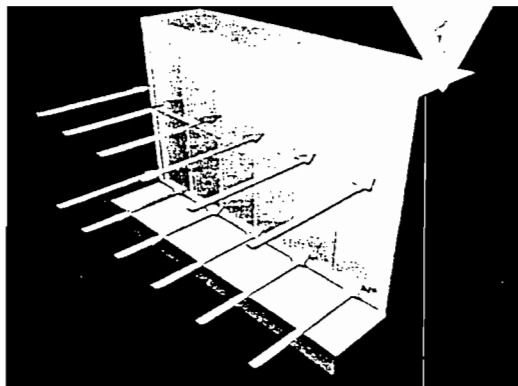
Patented, concentric spiral baffle collectors, no moving parts - no maintenance

IT'S EASY TO SEE HOW OSCAR IS REVOLUTIONIZING

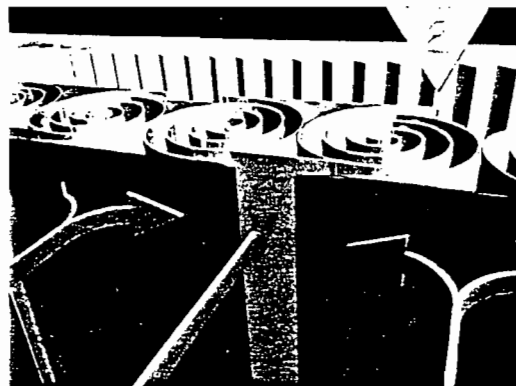
OS, I
TH C

At Every Stage of the Process, from Uniform Air Flow and Capturing Overspray, to In-the-Drum Paint Recovery, OSCAR System Helps You Capture More Profit.

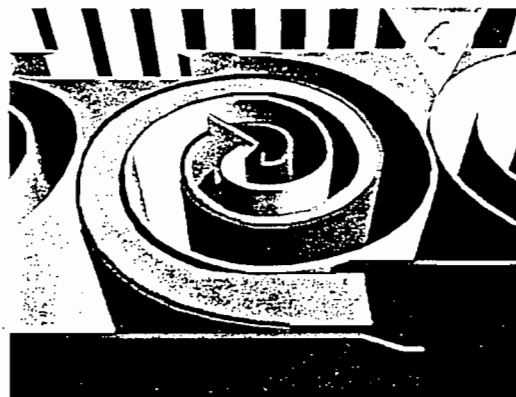
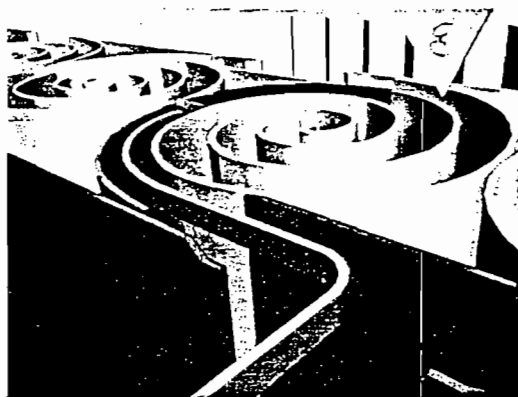
1. Uniform air flow across the booth face is provided by a series of uniformly spaced vertical air inlet slots which extend from the floor to the ceiling of the booth.



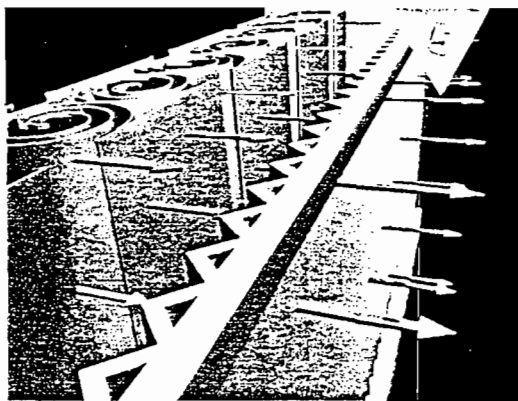
2. Up to 70% of the overspray strikes and is retained for collection by the front plates, located between the vertical air inlets on the booth face.



3. The overspray makes a sudden and radical change in direction as it enters the patented in-line concentric spiral baffle collectors. The largest and heaviest airborne paint droplets are collected here. Typically, 10% of overspray is deposited on interior faceplate and another 15% is captured in the first 90° of each spiral.



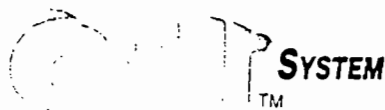
4. Ever increasing centrifugal force causes approximately 99% of overspray to be deposited on the outside wall of each spiral by the time the air stream reaches the reversing hook at the center of each spiral.



5. The very small amount of remaining airborne overspray moves through the out-bound spiral and into the Andreae HE Filter, where up to 99.6% of all remaining overspray is entrapped. The air stream leaving the Oscar System and plant exhaust stack is more than 99.9% free of overspray.

6. As paint builds up on the vertical surfaces of the plates and spirals, gravity causes it to sag, then flow down into the collection trough. Maximum paint build-up before this process begins is typically 1/16" to 1/8". The Oscar System auger paint pump picks up the recovered paint through its multiple inlet ports and pumps it to a collection drum located outside outside the spray paint booth.

Install Andreae Filters, Inc. Oscar System for Better than 99% Efficient Paint Collection and Recovery!



SYSTEM

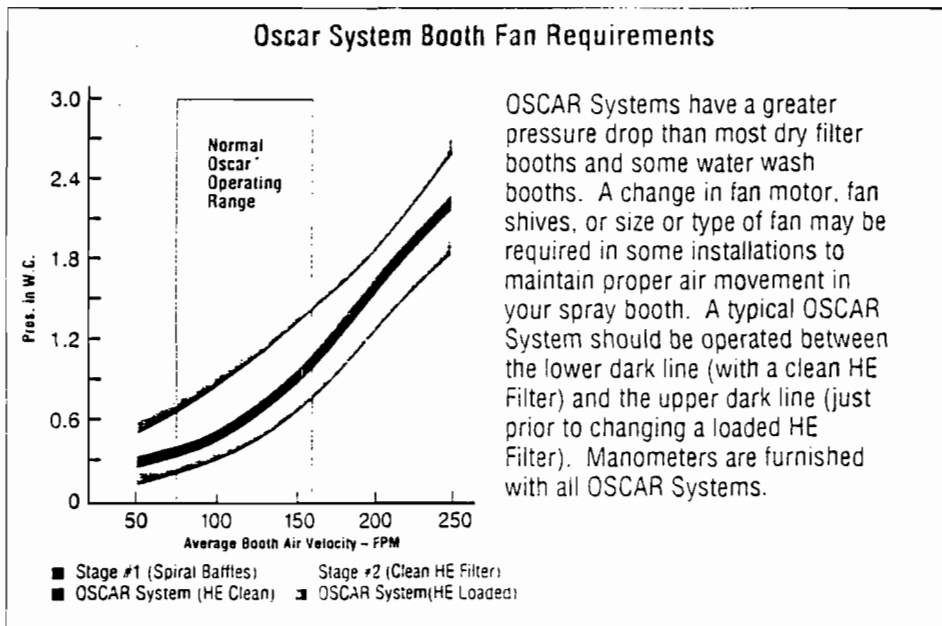
TM

OSCAR SYSTEM IS THE BEST OVERSPRAY COLLECTION AND RECOVERY SYSTEM

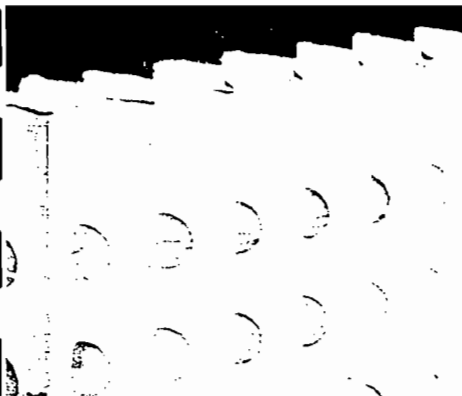
Andreae Filters, Inc.
Patented and Field-Proven
Oscar System - the High
Performance Overspray and
Collection Recovery System
that Pays for Itself!

Andreae Filters Oscar System:

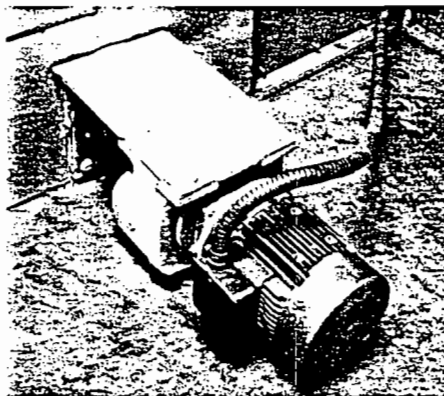
- ▼ Recovers up to 99% of overspray for disposal or recycling
- ▼ Reduces VOC emissions by up to 25%*
- ▼ Minimizes disposal costs
- ▼ Is the most efficient paint spray booth overspray collection and recovery system on the market



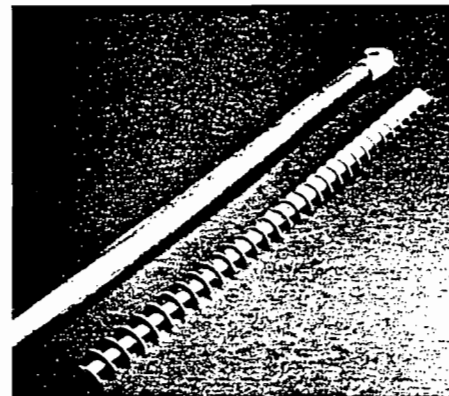
OSCAR Systems have a greater pressure drop than most dry filter booths and some water wash booths. A change in fan motor, fan shives, or size or type of fan may be required in some installations to maintain proper air movement in your spray booth. A typical OSCAR System should be operated between the lower dark line (with a clean HE Filter) and the upper dark line (just prior to changing a loaded HE Filter). Manometers are furnished with all OSCAR Systems.



Andreae HE Filter - the new patented Andreae HE Filter captures more than 99.6% of remaining overspray as it exits the system's concentric spiral collectors. This raises Oscar's overall capturing efficiency to greater than 99.9%.



Drive Motor and Interval Timer Control - A 1 HP explosion-proof 230/460/60/3 right-angle gear motor drives the auger pump. A 24-hour interval timer and motor controller is provided. These controls are contained in a general purpose enclosure and must be mounted in an appropriate location.



Auger Paint Recovery Pump - The Oscar System pump's multiple inlet points enable it to pick up the paint accumulating in the trough and pump it to a collection vessel.



Collection Drum and Piping Systems (supplied by user) - Black iron, stainless steel or PVC pipe should be used to route the recovered paint from the exit end of the auger assembly to a 55 gallon drum.

"We Build Better Paint Traps"

ANDREAE

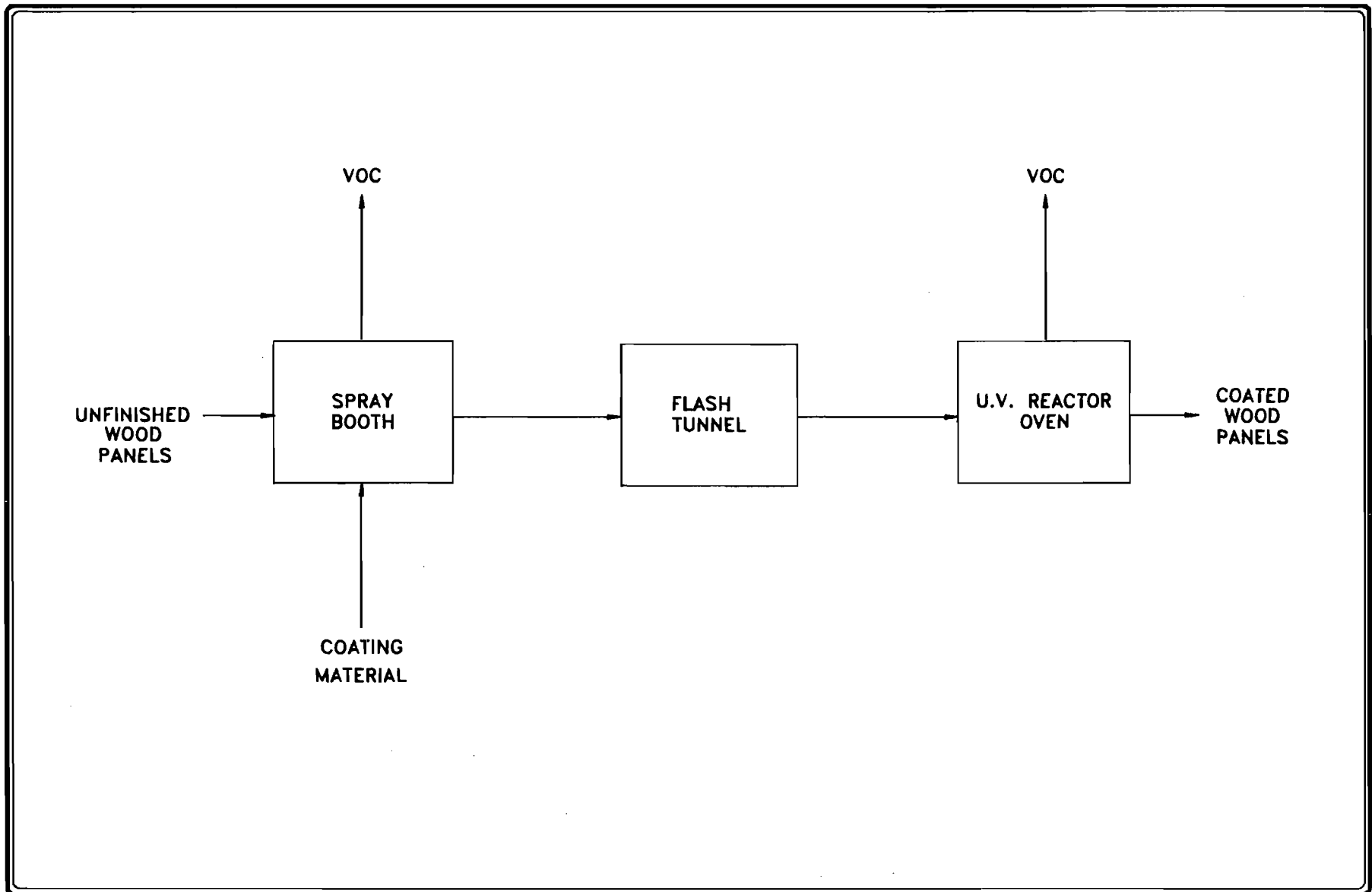
FILTERS

Andreae Filters, Inc.
 3550 Cypert Way
 New Horizons Industrial Park
 Ardmore, OK 73401

For more information:
 Call: 1-800-334-7943
 Fax: 1-405-226-7510

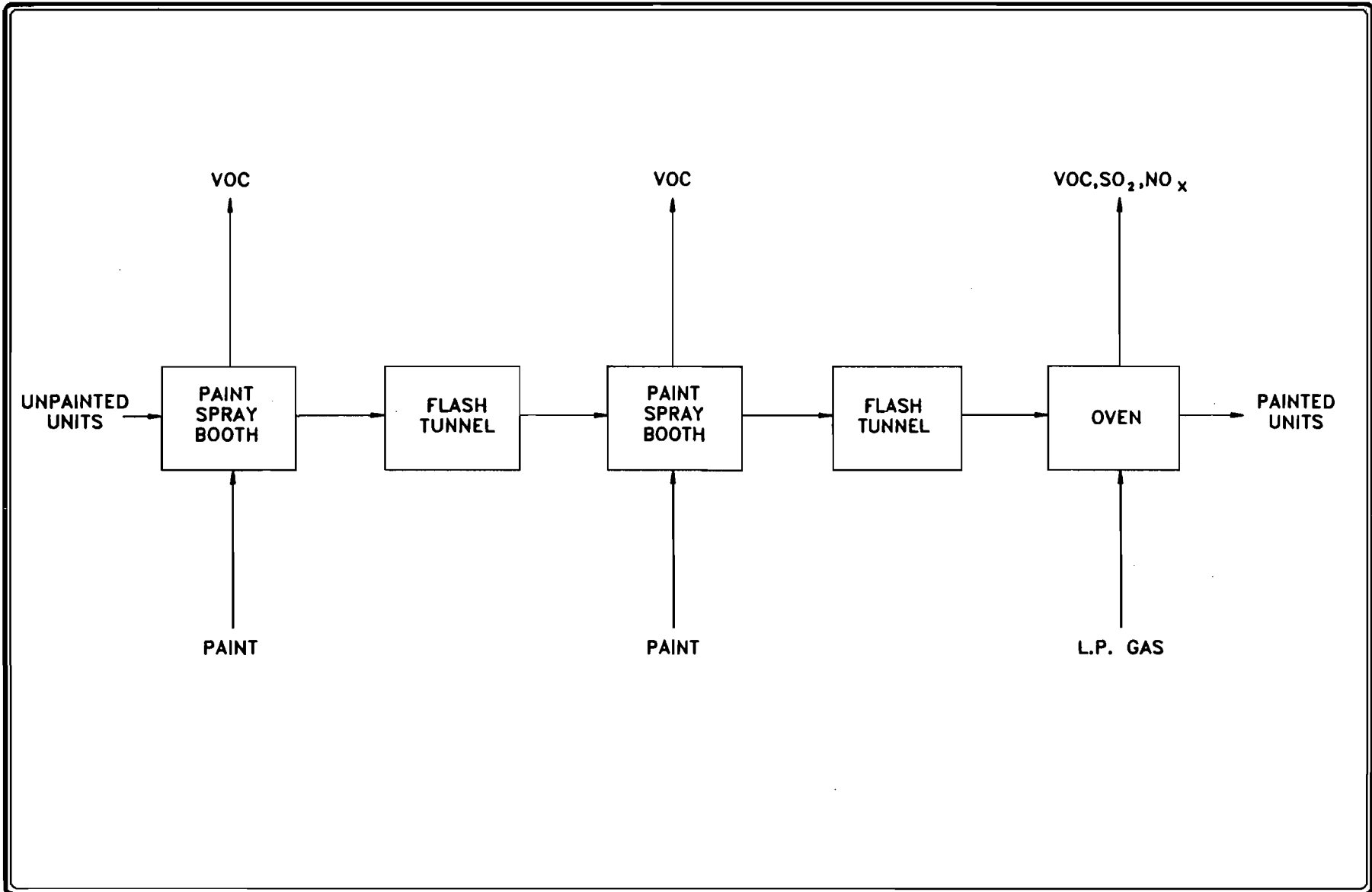
*Actual percentage may vary by location. Solvent remaining in recovered paint is not released to atmosphere. US Patent Numbers 4,927,437 & 4,973,341 as well as numerous pending Foreign Patents.

© 1991 Andreae Filters, Inc.
 © Andreae Filters is the registered trademark of Andreae Filters SA Switzerland
 Specifications are subject to change without notice
 SA-910501



M&A	<i>ENVIRONMENTAL AND GROUNDWATER SERVICES</i>		Missimer & Associates, Inc.
	DRN. BY: CLP DWG NO. 92J0130	DATE: 3-23-92	
PROJECT NAME: MARK III INDUSTRIES		PROJECT NUMBER: JE1-448	

ATTACHMENT 4. PROCESS FLOW DIAGRAM, CABINET SHOP



ENVIRONMENTAL AND GROUNDWATER SERVICES

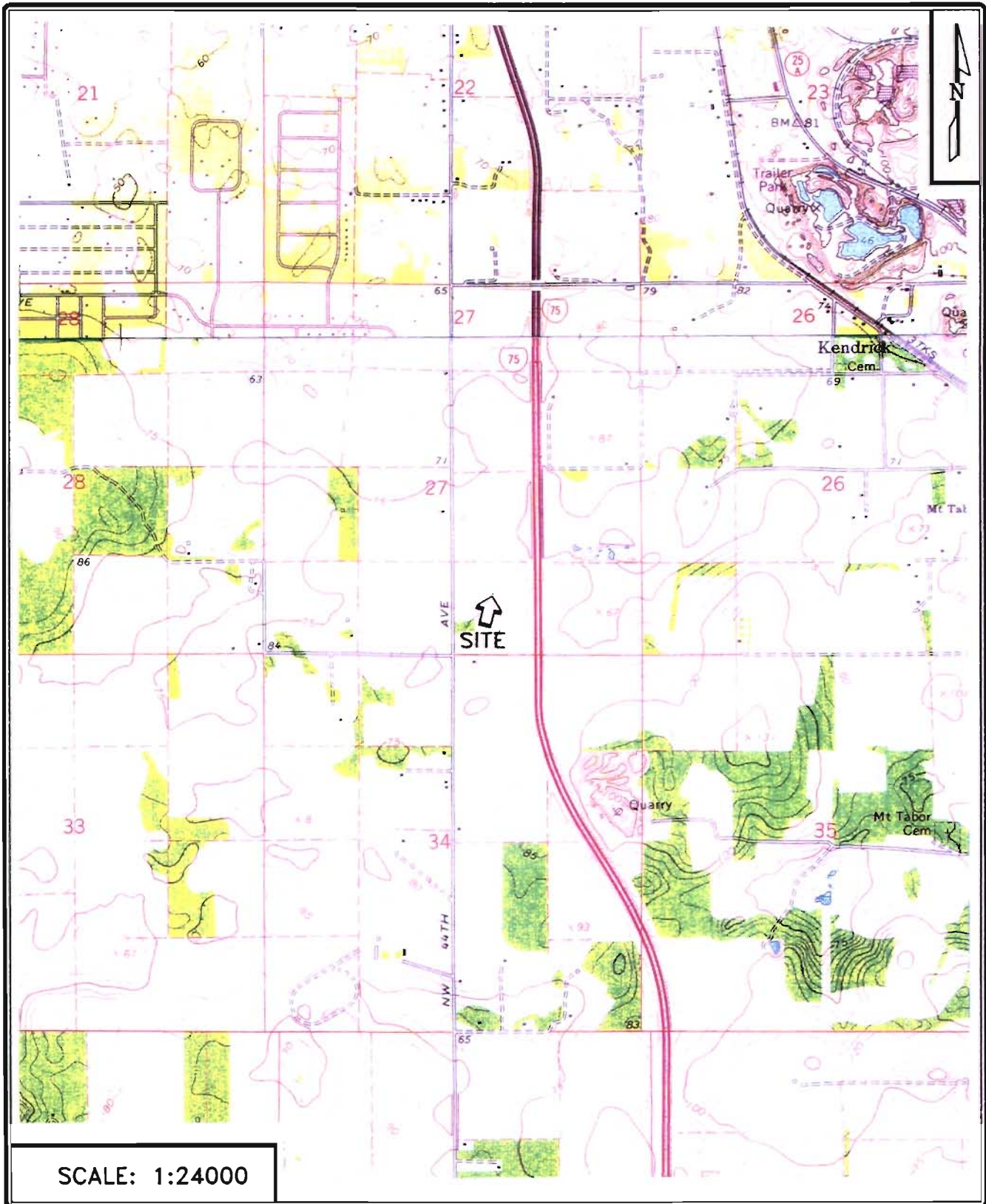
DRN. BY: CLP DWG NO. 92J0131

DATE: 3-23-92

PROJECT NAME: MARK III INDUSTRIES

PROJECT NUMBER: JE1-448

Missimer
&
Associates, Inc.



SCALE: 1:24000

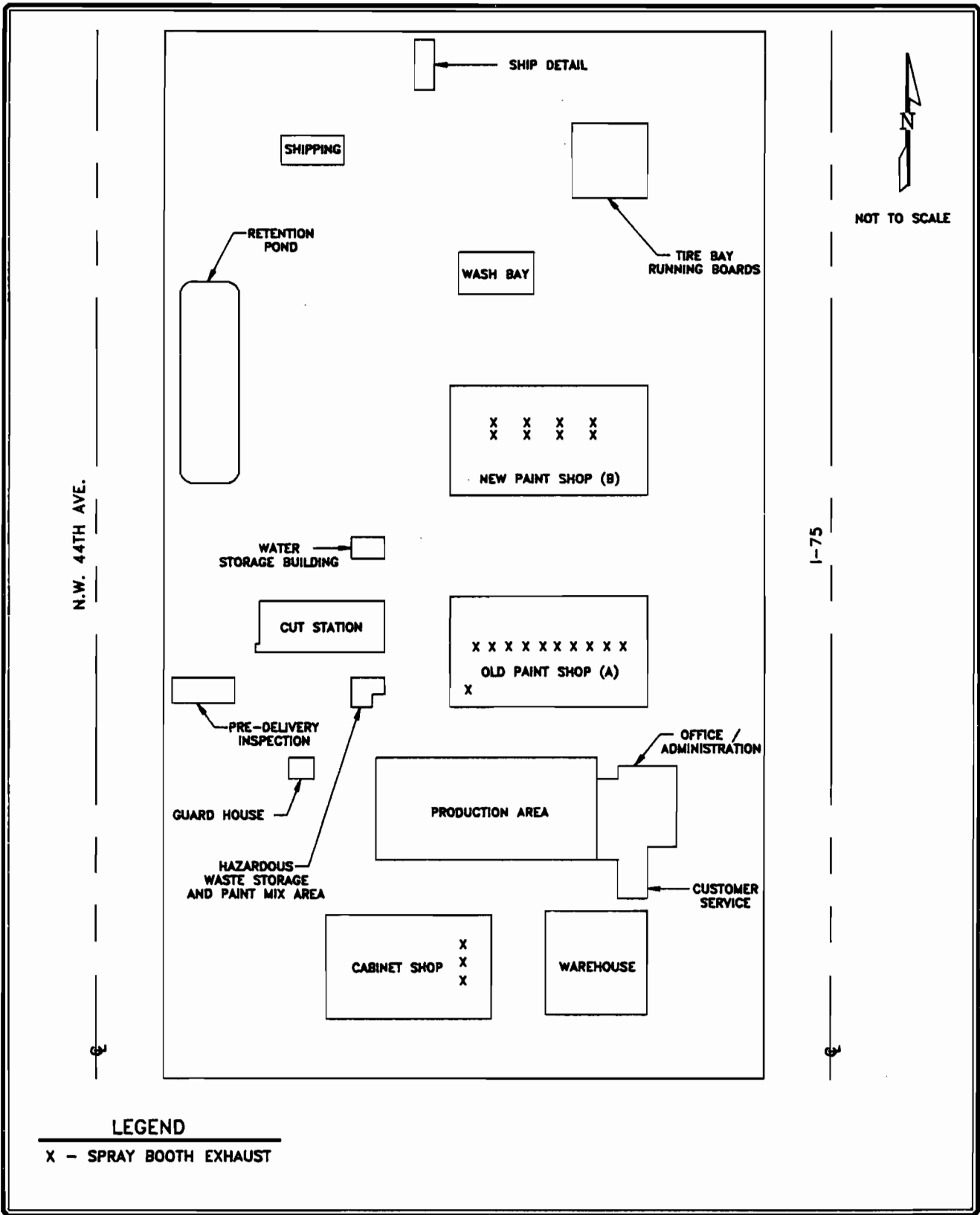


ENVIRONMENTAL AND GROUNDWATER SERVICES

DRN. BY: CLP DWG NO. 91J1520 DATE: 3-23-92
 PROJECT NAME: MARK III INDUSTRIES NUMBER: JE1-448

**Missimer
&
Associates, Inc.**

ATTACHMENT 6. SITE LOCATION MAP MARK III INDUSTRIES, OCALA, FL
 SOURCE: USGS OCALA WEST AND REDDICK, FL



M&A	<i>ENVIRONMENTAL AND GROUNDWATER SERVICES</i>		Missimer & Associates, Inc.
	DRN. BY: CLP DWG NO. 92J0121	DATE: 3-23-92	
	PROJECT NAME: MARK III INDUSTRIES	NUMBER: JE1-448	

ATTACHMENT 7. PLOT PLAN