



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 9, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Boyd:

Re: Expiration Date Extensions for Construction Permits  
AC 42-154375: UV Reactor Room Operation  
AC 42-154393: Paint Spray Booth (22) Operations

The Department has reviewed the above requests contained in Mr. F. Joe Krim, Jr.'s letter received on June 17, 1991. The requests are acceptable and the following will be changed and added:

1. Expiration Date

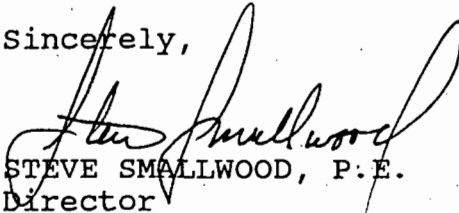
From: September 30, 1991  
To: June 30, 1992

2. Attachment to be Incorporated

o Mr. F. Joe Krim, Jr.'s letter received on June 17, 1991.

This letter must be attached to the construction permits, Nos. AC 42-154375 and AC 42-154393, and shall become a part of the permits.

Sincerely,



STEVE SMALLWOOD, P.E.  
Director

Division of Air Resources  
Management

SS/BM/rbm

Attachment

cc: B. Thomas, SW District  
D. Gaboardi, Mark III Ind.

W. C. Ziegel, P.E., WAR, Inc.  
T. P. Oxford, P.E., JEG, Inc.



RECEIVED  
JUN 17 1991  
Division of Air  
Resources Management

June 13, 1991

Mr. Clair Fancy, Bureau Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy,

Based on discussions held at FDER offices on May 29, 1991, we respectfully request extensions as specified on the following permits:

- 1) AC 42-154375 for the Ultraviolet Reactor Room Operations, expiration date September 20, 1991. A desired expiration date of June 30, 1992, is requested.
- 2) AC 42-154393 for Paint Spray Booth Operations, expiration date of September 30, 1991. A desired expiration date of June 30, 1992, is requested.

Sincerely,

A handwritten signature in dark ink, appearing to read 'F. Joe Krim, Jr.', is written over the typed name.

F. Joe Krim, Jr.  
Vice President

FJK/pb

cc: Mr. Bruce Mitchell, FDER, Tallahassee  
Mr. Bill Thomas, Southwest District FDER  
Mr. Thomas P. Oxford, Jacob Engineering



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

July 30, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Boyd:

Re: Expiration Date Extensions for Construction Permits  
AC 42-154375: UV Reactor Room Operation  
AC 42-154393: Paint Spray Booth (22) Operations

The Department has reviewed the above requests contained in your letter that was received on April 23, 1990. The requests are acceptable and the following will be changed and added:

1. AC 42-154375

a. Expiration Date:

From: June 30, 1990  
To: December 31, 1990

b. Attachment to be Incorporated:

10. Mr. R. Thad Boyd III's letter received April 23, 1990.

2. AC 42-154393

a. Expiration Date:

From: June 30, 1990  
To: December 31, 1990

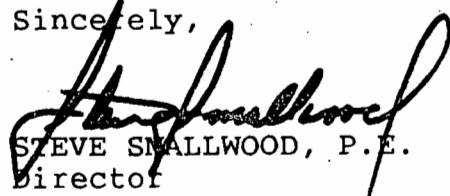
b. Attachment to be Incorporated:

8. Mr. R. Thad Boyd III's letter received April 23, 1990.

Mr. R. Thad Boyd III  
Page Two  
July 30, 1990

This letter must be attached to the construction permits, numbers AC 42-154375 and AC 42-154393, and shall become a part of the permits.

Sincerely,



STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/BM/plm

Attachment

c: B. Thomas, SW District  
D. Gaboardi, Mark III Ind.  
W. C. Zegel, P.E., WAR, Inc.  
T. P. Oxford, JEG, Inc.



RECEIVED

APR 23 1990

DER-BAQM

April 20, 1990

Mr. Clair Fancy  
Bureau Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Mark III Industries, Ocala, FL  
Request for Extension of Permit Expiration Date

Dear Sir:

We respectfully request extensions as specified on the following permits:

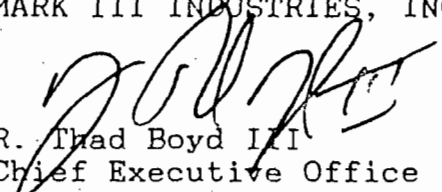
1. AC 42-154375 for the Ultraviolet Reactor Room Operations, expiration date June 30, 1990. A desired expiration date of December 31, 1990, is requested.
2. AC 42-154393 for Paint Spray Booth (22) Operations, expiration date of June 30, 1990. A desired expiration date of December 31, 1990, is requested.

In the course of our new source review, we have located some promising new technologies that we would like to further evaluate. An extension of our permits would afford us the opportunity to do so. Enclosed is a summary of our efforts to date to seek out and evaluate methods of controlling VOC emissions.

Please advise at your earliest opportunity if additional information is required in support of this extension request.

Yours truly,

MARK III INDUSTRIES, INC.



R. Thad Boyd III  
Chief Executive Office

RTB:mlw

cc: Mr. Bruce Mitchell, FDER, Tallahassee  
Bill Thomas, Southwest District FDER  
Thomas P. Oxford, Jacobs Engineering



There are three basic ways to reduce the amount of volatile organic compounds (VOC) emitted during the painting process: 1. reduce them prior to application through product reformulation or substitution; 2. reduce them at time of application by improved transfer efficiency and/or painting techniques; 3. reduce them after application through the use of some type of capture and/or destruction system. Mark III has been researching and evaluating all three methods and feels that the first two methods are the preferable alternatives because of the flexibility they offer and for reasons of economics. Following is a brief summary of Mark III's efforts and findings in each of these areas.

#### Product Reformulation and Substitution

Mark III is constantly looking for ways to improve the quality and value of our product. In 1987, our cabinet shop became one of the first in the nation to spray ultraviolet cured coatings on a three-dimensional substrate when we switched from nitrocellulose lacquers, which had a higher VOC content than UV materials. In 1988, we lowered the VOC content of one of our coatings by an additional eight percent. Since then, we have worked with a number of coatings manufacturers (Lilly Industrial Coatings, Sadolin Chemcraft, Crown Metro, Reliance Chemical, Guardsman, and Valspar, to name a few) to develop lower VOC materials that will give the

quality that is required in a Mark III vehicle. To date, we have not identified a product that meets all our criteria, but we are actively pursuing this. Within the past two weeks, we have tested three new materials with solids contents of up to 75 percent. The results of those tests have not yet been fully evaluated.

One avenue that was quickly abandoned was the idea of using exempt solvents, such as 1,1,1 trichloroethane, in the formulation of our finishes. Mark III felt that this was, at best, a short-term solution and that our efforts should be directed elsewhere.

The use of waterborn materials has been actively pursued since August of 1989 in the cabinet shop. With the help of our suppliers, we have been able to overcome most of the technical problems that arose in testing these materials. Currently, we are soliciting bids for the installation of a climate-control system for the cabinet shop paint room. Such a system would allow the waterborn materials to be cured properly no matter what the ambient weather conditions might be. It is estimated that the use of a waterborn stain would lower VOC emissions from the cabinet shop by as much as 30 percent. According to industry estimates, the development of waterborn UV materials is still two to three years away.

On the automotive side, our suppliers have not been as successful in developing lower VOC materials. We have dealt with major paint manufacturers such as Sherwin-Williams, PPG, BASF, and Dupont and smaller suppliers such as American Finishes and Sun Belt Coatings. None of them, as of yet, have come up with a suitable lower VOC painting for use in the refinish market. Within the next three weeks, we will be testing and evaluating paints supplied by Dupont, BASF, Sherwin-Williams, and American Finishes. Anticipated

VOC reductions range from .3 pounds to .5 pounds per unit painted, but none of these figures have been proven. The quality of the finish and the ease of application must also be evaluated.

Our current supplier, Dupont, predicts they will have developed a waterborn automotive refinish paint by 1993. At that time, it would be available for evaluation purposes.

#### Application Methods

Mark III has looked at three different methods of improving the transfer efficiency of our painting processes. They are high volume, low pressure (HVLP) spray guns, carbon dioxide (CO-2) spray system, and nitrogen-assist spray system.

In 1989, we first evaluated HVLP guns in both our automotive paint shops and in our cabinet shop paint room. At that time, we determined that they were unsuitable for use here since production time was increased by as much as a factor of four. Since then, the guns have been improved and we recently re-evaluated some of them. We determined that a gun made by Graco could be used in the automotive paint shop, for clear top coats only, with no significant loss of production. The use of HVLP guns would provide only a temporary solution to the problem of VOC reduction. HVLP guns work best when used with high VOC content materials and begin to lose their effectiveness as the amount of solvents in the paint is decreased. The coatings manufacturing industry as a whole is moving toward lower VOC formulations, thus limiting the long-term effectiveness of HVLP guns.

Mark III first contacted Union-Carbide to discuss their CO-2 spray system in October of 1989. We determined that CO-2 would be most applicable for spraying clear top coat in the automotive paint



shops. Unfortunately, the process caused the pot life of the paint to drop from about three and one-half hours to about three minutes, thus rendering the material unusable. In March of this year, we brought in a representative from Union-Carbide to tour our facility and see how they might be able to help Mark III lower VOC emissions. No one is currently using CO-2 on a commercial basis and the soonest that equipment would be available for a good evaluation would be fall of this year. In order to set up a system, Union-Carbide requires a licensing fee, plus the payment of royalties (approximately \$2.00 - \$3.00) for each gallon of material sprayed.

Mark III first contacted Nitrogen Spray Systems in mid-March. We were able to have one of their representatives come in for an initial demonstration of their equipment on March 16 and 17, 1990. On April 2 and 3, 1990, we had them back in for further tests and demonstrations. Initial reactions were that a nitrogen-assist spray system could help reduce VOC emissions through a more efficient application of materials and that the most likely use for the equipment is in the cabinet shop paint room. AIMCO, the area distributor for the nitrogen-assist equipment, advertises a 40 percent savings on materials with the use of their system. Mark III intends to purchase and install four nitrogen-assist systems in the cabinet shop and test them during the month of May in order to obtain a real-life determination of the material savings and transfer efficiency achievable with this equipment.

The nitrogen spray system has been available commercially for only about six months and has not been used anywhere else to spray automotive finishes of the type used by Mark III. Because of the promise this equipment appears to offer, we intend to continue

testing it in our automotive paint shop with the intent of being the first to use it to apply automotive refinish materials. To that end, we have instructed our paint supplier, Dupont, to work with AIMCO in developing a system that will work at Mark III. The first meeting between these two groups is scheduled for the end of April 1990.

#### Capture and Destruction

The third method of reducing VOC emissions is through the use of add-on controls or capture and destruction systems. Jacobs Engineering has conducted an evaluation of the traditional and conventional methods and equipment used for this. The results showed all these methods to be extremely costly, both for capital outlay and operating costs.

In addition to the methods researched by Jacobs, Mark III was able to locate a new type of add-on control, namely oxidation of VOC through the use of ozone. We brought in the individual who developed this method to explain the system and to see if it could be adapted to our facility. The supplier, Engineered Air Systems, is willing to guarantee a destruction efficiency of 65 percent. The process blends ozone with VOC in the exhaust stack, thus destroying the VOC and releasing carbon dioxide and oxygen into the atmosphere. To date, we have gotten a bid for the construction of only one unit (one would be required for each booth) and by extrapolating from that figure, we estimate a capital cost of approximately \$2.7 million. Since this is such a new technology, on the market for less than a year, it is difficult to arrive at operating costs. However, Engineered Air Systems estimates that it

would cost somewhere between \$2.50 and \$3.00 per hour to operate one of these units.

In summary, the development of the nitrogen-assist spray system and the reformulation of our coatings or the development of new coatings appear to offer the best long-term solutions to the problem of VOC reduction. By the end of May, we hope to demonstrate a 20 percent reduction in emissions from the cabinet shop, as well as a transfer efficiency of 65 percent through the use of the nitrogen systems to be installed there. Once the nitrogen system is adapted to the automotive painting process, we would be able to demonstrate similar reductions there. Through reformulations and substitutions, we should be able to obtain an additional 20 percent reduction in emissions. If greater reductions do result, we will incorporate these figures into our calculations.

Mark III will continue to explore new avenues in the search for ways to reduce VOC emissions. The manufacturer of the infrared ovens that are used in Paint Shop "B" is presently conducting research that will allow us to quantify the amount of VOC destruction that occurs there. That information should be available by summer's end. We will soon be evaluating the use of small infrared heaters to increase the viscosity of very high solids materials. The use of these materials could further reduce emissions, if the technology proves feasible for use here. The field of VOC reduction is rapidly expanding in all directions. Mark III intends to seek out and evaluate those products, techniques, and technologies that offer the opportunity to reduce VOC emissions while maintaining the level of quality for which Mark III is known.



April 20, 1990

RECEIVED

APR 23 1990

Mr. Clair Fancy  
Bureau Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

DER-BAQW

Re: Mark III Industries, Ocala, FL  
Request for Extension of Permit Expiration Date

Dear Sir:

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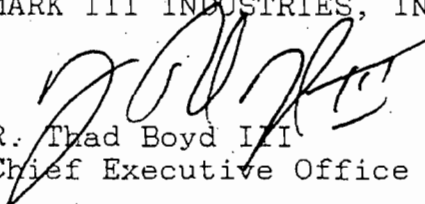
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Please advise at your earliest opportunity if additional information is required in support of this extension request.

Yours truly,

MARK III INDUSTRIES, INC.

  
R. Thad Boyd III  
Chief Executive Office

RTB:mlw

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Bill Thomas, Southwest District FDER  
Thomas P. Oxford, Jacobs Engineering



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would cost somewhere between \$2.50 and \$3.00 per hour to operate one of these units.

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Mark III will continue to explore new avenues in the search for ways to reduce VOC emissions. The manufacturer of the infrared ovens that are used in Paint Shop "B" is presently conducting research that will allow us to quantify the amount of VOC destruction that occurs there. That information should be available by summer's end. We will soon be evaluating the use of small infrared heaters to increase the viscosity of very high solids materials. The use of these materials could further reduce emissions, if the technology proves feasible for use here. The field of VOC reduction is rapidly expanding in all directions. Mark III intends to seek out and evaluate those products, techniques, and technologies that offer the opportunity to reduce VOC emissions while maintaining the level of quality for which Mark III is known.



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

May 3, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thad Boyd, III  
Chief Executive Officer  
Mark III Industries  
Post Office Box 2525  
Ocala, Florida 32678

Dear Mr. Boyd:

Re: Request for Amendments to Construction Permit  
No. AC 42-154375

The Department is in receipt of your letter dated April 21, 1989, requesting corrections to the potential VOC/OS emissions contained in the above referenced permit. Since the questioned emissions were considered in the Technical Evaluation and Preliminary Determination, the Department agrees with the request and the following will be changed and added:

AC 42-154375: Specific Conditions

o No.A.2.:

From: For PSD tracking, the projected potential volatile organic compounds (VOC)/organic solvents (OS) are 4.6 lbs/hr and 4.7 TPY.

To: For PSD tracking, the projected potential volatile organic compounds (VOC)/organic solvents (OS) are 4.6 lbs/hr and 9.4 TPY.

o No. B.2.:

From: For PSD tracking, the projected potential VOC/OS emissions are 9.3 lbs/hr and 9.5 TPY.

To: For PSD tracking, the projected potential VOC/OS emissions are 9.3 lbs/hr and 19.0 TPY.

Mr. Thad Boyd, III  
Page Two  
May 3, 1989

o No. C. 2.:

From: For PSD tracking, the projected potential VOC/OS emissions are 8.2 lbs/hr and 8.4 TPY.

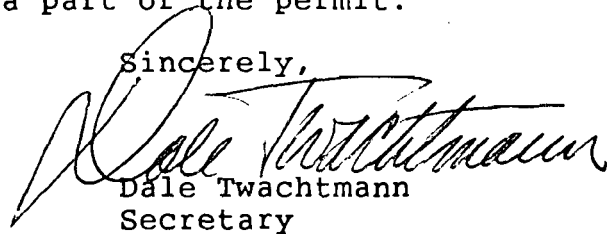
To: For PSD tracking, the projected potential VOC/OS emissions are 8.2 lbs/hr and 16.7 TPY.

Attachment to be Incorporated:

8. Mr. Thad Boyd, III's letter received April 25, 1989.

This letter must be attached to your construction permit, No. AC 42-154375, and shall become a part of the permit.

Sincerely,



Dale Twachtmann  
Secretary

DT/ks

attachment

cc: B. Thomas, SW District  
D. Gaboardi, M3I  
W. C. Zegel, P.E., WAR, Inc.

4-24-89  
Ocala, FL



RECEIVED

APR 25 1989

DER-BAQM

April 21, 1989

Mr. C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy,

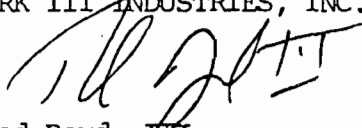
In reviewing our construction permits, we have discovered what appear to be transcription errors in permit number AC 42-154375. Under specific conditions A.2., our projected potential VOC/OS is listed as 4.6 lbs./hr. and 4.7 TPY when in fact it should be 4.6 lbs./hr. and 9.4 TPY. Specific conditions B.2. should read 9.3 lbs./hr. and 19.0 TPY rather than 9.3 lbs./hr. and 9.5 TPY. Additionally, specific conditions C.2. should read 8.2 lbs./hr. and 16.7 TPY instead of 8.2 lbs./hr. and 8.4 TPY. The incorrect figures reflect total operating hours of 2,040 hrs./yr. instead of the 4,080 hrs./yr. we requested.

As per our telephone conversation with Bruce Mitchell, we are requesting that the necessary corrections be made in permit number AC 42-154375 so that it reflects the accurate figures on potential emissions.

Thank you for your assistance in this matter.

Sincerely,

MARK III INDUSTRIES, INC.

  
Thad Boyd, III  
Chief Executive Officer

TB/so

cc: Mr. Bill Thomas, P.E. Administrator  
Southwest District  
4520 Oak Fair Blvd.  
Tampa, FL 33610

*Copied: B. Mitchell  
CHP/BT*



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

April 20, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thad Boyd, III  
Chief Executive Officer  
Mark III Industries  
Post Office Box 2525  
Ocala, Florida 32678

Dear Mr. Boyd:

Re: Letter of Inquiry Received April 3, 1989

The Department has conducted a preliminary evaluation of your proposal to increase the annual production of vehicles from a permitted level of 38,400 to 120,000 at your facility. Based on an evaluation by Bruce Mitchell and his discussions with David Gaboardi (Mark III Industries), the facility will be subject to PSD review pursuant to F.A.C. Rule 17-2.500(5), New Source Review (NSR), as if it had never been constructed.

As required by NSR, a determination of BACT (Best Available Control Technology) shall be proposed by Mark III Industries for the UV/Sealer operations and the paint spray booths (22) for the emissions of VOC/organic solvents.

Copies of F.A.C. Chapters 17-2 and 17-4, along with some application forms, have been included for your reference and use. If there are any questions, please give Bruce Mitchell a call at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/BM/s

enclosures

cc: B. Thomas, SW District  
D. Gaboardi, M3I  
B. Hewitt, Esq., DER

*ll copy*



RECEIVED

APR 3 1989

DER-BAQM

March 29, 1989

Mr. Bill Thomas, P.E. Administrator  
Southwest District  
4520 Oak Fair Blvd.  
Tampa, FL 33610

Dear Mr. Thomas,

Mark III Industries is currently operating under construction permits numbered AC 42-154375, AC 42-154393 and AC 42-154395. Under these permits, we are limited to producing 3,200 units per month while operating our cabinet shop no more than 4,080 hours per year and our paint shop no more than 2,040 hours per year. Given our past history and our projections for the future, we will soon meet these limits and then have to modify our permits. In order to avoid having to continually modify our permits, we would like to be permitted for round-the-clock operation with an upper limit of 10,000 units per month.

I would appreciate your sending us the necessary applications and instructions that would be needed for these modifications.

Thank you for your assistance in this matter.

Sincerely,  
MARK III INDUSTRIES, INC.

Thad Boyd, III  
Chief Executive Officer

TB/so

4/20/89

cc: ~~\_\_\_\_\_~~  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

*Copied: B. Matchell  
CHF/13T*

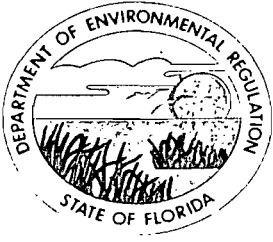
4-10-89

2:21

David Gulboardi called via B. Thomas (supdist) request to ✓ on an "If" situation (see above request). I told him to calc. the potential pollutant emissions as I would, and that I would call him this week to discuss. *BR*

original estimates:

$0.174 \times 8760 \times 22 = 142,613 \text{ veh/yr}$   
(veh/ha) (point booth)  
vs  $129,000 \text{ veh/yr}$  (req.)  
+ 22,613 vehicles



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

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

February 17, 1989

Enclosed are permit Nos. AC 42-154375, AC 42-154393 and AC 42-154395 for Mark III Industries to construct 11 new paint spray booths and permit 11 existing ones, to modify the existing woodworking shop operation, and to modify the existing UV room operations at the permittee's existing facility in Ocala, Marion County, Florida. These permits are issued pursuant to Section 403, Florida Statutes.

Any party to these permits has the right to seek judicial review of these 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 these permits are filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copy furnished to:

B. Thomas, SW District  
D. Gaboardi, Mark III Industries  
W. C. Zegel, P.E., WAR, Inc.



CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on February 20, 1989.

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

Martha J. Wise  
Clerk

February 20, 1989  
Date

Final Determination

Mark III Industries  
Marion County  
Ocala, Florida

Construction Permit Numbers:

AC 42-154375

AC 42-154393

AC 42-154395

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Quality Management  
Central Air Permitting

February 14, 1989

## Final Determination

The construction permit applications 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 January 21, 1989. The Technical Evaluation and Preliminary Determination (TE & PD) were available for public inspection at the DER's Southwest District and Bureau of Air Quality Management (Bureau) offices.

Comments were received from Mr. Charles E. Dorrity by letter and via phone conversations with Mr. David Gaboardi, both with Mark III Industries, and Mr. Mirza Baig, with the DER's Southwest District. The comments will be addressed on a per letter basis, and the Bureau's responses follow:

- A. Mr. Charles E. Dorrity's comments of January 30, 1989 (to be addressed in the order they were submitted)
  1. Comment on the TE & PD, Section I.B.
    - o Response: The Bureau agrees with the comment and acknowledges that the potential VOC/solvent emissions were based on 3200 vans per month. Since the transcribing error does not affect the position taken by the Bureau in the TE & PD, the TE & PD will not be reissued. However, the limitation will be established in the following:
      - a. AC 42-154393:  
Specific Condition  
No. 12: New  
  
The maximum production/processing of vans shall not exceed 3,200 per month.
  2. Comment on AC 42-154395, Specific Condition No. 1
    - o Response: The potential VOC/solvent emissions were based on 16 hours/day, 5 days/week, and 51 weeks/yr. Therefore, the Bureau agrees with the comment, and the following will be changed and added:

Specific Condition

No 1:

From: Permitted hours of operations are 8 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 2,040 hrs/year.

To: Permitted hours of operations are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.

B. Mr. Mirza Baig's comments of January 23, 1989 (to be addressed in the order submitted)

1. AC 42-154375 and AC 42-154393

a. Comment No. 1

o Response: Based on a phone conversation with Mr. Gaboardi on February 10, 1989, and for the sources represented in the proposed and above referenced construction permits, he claims that the vent stacks are installed such that emissions exit in the vertical plane. He also pointed out that an EPA Reference Method 9 can be conducted on all sources within the facility's boundary lines, of which is a requirement. Therefore, the following will be added:

(1) AC 42-154375:

Specific Condition

No. D.7: New

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

(2) AC 42-154393:

Specific Condition

No. 13: New

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

b. Comment No. 2

o Response: The Bureau agrees with the request and the following will be added:

(1) AC 42-154375:

Specific Condition

No. D.8: New

The Southwest District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the Southwest District office within 45 days of test completion pursuant to F.A.C. Rule 17-2.700(7).

(2) AC 42-154393:

Specific Condition

No. 14: New

The Southwest District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the Southwest District office within 45 days of test completion pursuant to F.A.C. Rule 17-2.700(7).

c. Comment No. 3

- o Response: Since there is not a regulation to impose the more restrictive VE limiting standard, there will not be a change in the VE limiting standard already cited as a Specific Condition.

2. AC 42-154395

a. Comment No. 1

- o Response: The project description on the cover page will be revised to include the following:

(1) Cover Page:

"The baghouse control system is a Pneumafil Dust Collector, Model 13 5-448-12, having a maximum design volumetric flow rate of 68,000 acfm."

o Response: Since the woodworking shop/source is a totally enclosed operation and serviced with a baghouse dust collection system, the most restrictive VE standard of "no visible emissions" (5% opacity) was imposed and the number of pick-up points were not considered. Therefore, no additional descriptions will be added.

b. Comment No. 2

o Response: As stated in the TE & PD and as required by F.A.C. Rule 17-2.700(2)(d), the Department shall require that a particulate matter (PM) emitting source be subjected to a mass emissions compliance test if it has reason to believe it is in violation of its particulate weight emissions standard. Also, and as stated in the TE & PD, the actual grain loading of the control system will be established if violations of the VE limiting standard of "no visible emissions" (5% opacity) are confirmed. Therefore, a PM mass test will be deferred until such time that VE violations are confirmed.

c. Refer to Comment No. 2 for AC 42-154375 and AC 42-154393

o Response: The following will be added:

Specific Condition

No. 8: New

The Southwest District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the Southwest District office within 45 days of test completion pursuant to F.A.C. Rule 17-2.700(7).

Attachments to be Incorporated:

o AC 42-154375 and AC 42-154393

5. Mr. Mirza Baig's Interoffice Memorandum dated January 23, 1989, and received January 25, 1989.
6. Mr. Charles E. Dorrity's letter dated January 30, 1989, and received January 31, 1989.

o AC 42-154395

6. Mr. Mirza Baig's Interoffice Memorandum dated January 23, 1989, and received January 25, 1989.
7. Mr. Charles E. Dorrity's letter dated January 30, 1989, and received January 31, 1989.

The Bureau will incorporate the changes in the appropriate construction permits, as referenced above in the final determination. It is recommended that the construction permits be issued as drafted, with the above revisions and attachments incorporated.

1-23-89  
Ocala, FL

file copy

**PROOF OF PUBLICATION**  
**THE OCALA STAR-BANNER**  
Published—Daily  
OCALA, MARION COUNTY, FLORIDA

RECEIVED

JAN 24 1989

DER-BAQM

STATE OF FLORIDA,  
COUNTY OF MARION.

Before me the undersigned authority personally appeared Lynn Maxwell, who on oath says that he is Classified Manager of the Ocala Star-Banner, a daily newspaper published at Ocala, in Marion County, Florida; that the attached copy of advertisement, being a notice in the matter of #1923-Notice of Intent to Issue \_\_\_\_\_ in the \_\_\_\_\_ Court, was published in said newspaper in the issues of January 21, 1989

Affiant further says that the said THE OCALA STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post office in Ocala, in said Marion County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or cooperation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Lynn Maxwell

Sworn to and subscribed before me this 23 day

January, A.D., 1989

Kelly Vandermeer  
Notary Public

Seal)

Notary Public, State of Florida  
My Commission Expires August 1, 1990  
Bundled and Telexed to the Registrar

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue  
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 construct/install 11 new point spray booths and permit 11 existing ones, to modify the existing wood-working shop operation, and to modify the existing UV room operation. The proposed project will occur at the applicant's existing facility in Marion County, Florida. 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. The petition must contain the information set 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, Florida Statutes.

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, 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, F.A.C.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Dept. of Environmental Regulation Bureau of Air Quality Management 2600 Blair Stone Road

Tallahassee, Florida 32399-2400  
Dept. of Environmental Regulation  
Southwest District  
14520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.  
No. 1923 — January 21, 1989

cc: B. Mitchell  
B. Thomas, SW Dist





State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

| For Routing To Other Than The Addressee |                 |
|---|-----------------|
| To: _____                               | Location: _____ |
| To: _____                               | Location: _____ |
| To: _____                               | Location: _____ |
| From: _____                             | Date: _____     |

# Interoffice Memorandum

TO: Bill Thomas - BAQM

THRU: Bill Thomas *WST*  
J. Harry Kerns *JK*

FROM: Mirza P. Baig *MB*

DATE: January 23, 1989

SUBJECT: Mark III Industries, Ocala - Marion County  
Permit Nos: AC42-154375, AC42-154393 & AC42-154395

An intent to issue construction permits mentioned above was issued on January 17, 1989. Following are our comments:

Permit Nos: AC42-154375 and AC42-154393

1. The stack heights for all point sources covered in these permits should be increased or install a 90° elbow to the stacks so that a V.E. test can be conducted conveniently.
2. A specific condition should mention the stack test notification requirements.
3. We disagree with 20% opacity limitation. It must not be more than 5% for all painting/drying/curing operations.

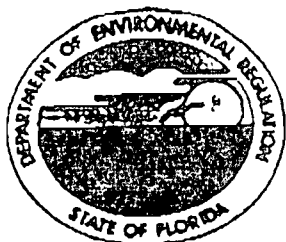
Permit No: AC42-154395

1. The project description should be re-defined to include the Make/Model No. of the baghouse and the designed flow (ACFM). The project should describe in detail all the pick-up points from the shop and their maximum capacity/production rates.
2. We strongly feel that a new baghouse of this size ( 65,000 ACFM) must be tested for particulates and V.E. initially. A V.E. test can be requested by the applicant for annual stack testing. The 5-8 #/hr. limitation must be tied into the grain loading concentration.

Please hold off issuing construction permits until February 3, 1989 so that I can inspect this facility (in the next few days) to verify that the new (11) spray paint booths have not already been constructed. I will call you before February 3, 1989 to report my findings.

MPB/mbq

cc: Bruce Mitchell - BAQM



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

## FAX TRANSMITTAL SHEET

Jan 25, 1989

Date

TO: Bill Thomas - BA&M / Bruce Mitchell

Dept.: DER - Tallahassee AIR SECTION

Phone: Sun Com 278-1344

FROM: Mirza P. Baig

Dept.: DER - Tampa

Phone: Sun Com 552-7612

OPERATOR: \_\_\_\_\_

Phone: \_\_\_\_\_

SUBJECT: \_\_\_\_\_

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: \_\_\_\_\_

RECEIVED BY: \_\_\_\_\_

Phone: \_\_\_\_\_

1-30-89  
Gina FL

1-30-89



RECEIVED

JAN 31 1989

January 30, 1989

Mr. C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation DER-BAQM  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

In reviewing the Technical Evaluation and Preliminary Determination and proposed permits for Mark III Industries, we noted two areas for comment.

Paragraph I.B. of the Technical Evaluation and Preliminary Determination indicates that we will double our production from 1600 vans per year to 3200 vans per year. Our intent is to go from 1600 vans per month to 3200 vans per month. All calculations in the applications were based on the latter figures. We feel that a typographical error was made somewhere and this discrepancy can be corrected accordingly.

The second area noted for comment is of the same nature. Permit No. AC-42-154395, specific condition #1 calls for operating parameters of 8 hrs/day and a total of 2040 hrs/yr. Our application for that permit specified 16 hrs/day and a total of 4080 hrs/yr in operation. All calculations in the application were based on these higher figures. Please make the appropriate adjustments to Permit No. AC 42-154395.

Sincerely,

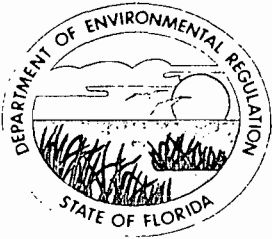
MARK III INDUSTRIES, INC.

*Charles E. Dorrity*  
Charles E. Dorrity,  
Executive Vice-President

CED:dg:st

cc: Mr. Bill Thomas  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

*copy to ...  
C.E./ET*



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

## PERMITTEE:

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

Permit Number: AC 42-154375  
Expiration Date: Dec. 31, 1989  
County: Marion  
Latitude/Longitude: 29°11'00"  
82°15'24"

Project: Ultraviolet Reactor  
Room Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 the permitting of the existing ultraviolet (UV) reactor room, which contains three coating stations and three curing units (two UV reactors and one air drying oven), and the construction/installation of an enclosure between each coating station and subsequent curing unit. The enclosure will contain volatile organic compounds/organic solvents and prevent their release into the surrounding working environment. Each curing unit vents its emissions to the atmosphere through roof vents.

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 Ultraviolet Coating ( $10^3$  ft<sup>2</sup> prod. surface area)

The source shall be 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 September 6, 1988, by the DER's Southeast District.
2. Mr. C. H. Fancy's letter dated October 5, 1988.
3. Mr. Thad Boyd III's letter received November 21, 1988.
4. Technical Evaluation and Preliminary Determination dated January 13, 1989.
5. Mr. Mirza Baig's Interoffice Memorandum dated January 23, 1989, and received January 25, 1989.
6. Mr. Charles E. Dorrity's letter dated January 30, 1989, and received January 31, 1989.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

GENERAL CONDITIONS:

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

GENERAL CONDITIONS:

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

**A. Sealer Coating Station and Air Drying Oven**

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.
2. For PSD tracking, the projected potential volatile organic compounds (VOC)/organic solvents (OS) are 4.6 lbs/hr and 4.7 TPY.
3. Visible emissions (VE) from the roof vent shall be less than 20% opacity.



PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

SPECIFIC CONDITIONS:

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(2)(6)9. and 40 CFR 60, Appendix A.

B. Sealer Coating Station and UV Reactor No. 1

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.

2. For PSD tracking, the projected potential VOC/OS emissions are 9.3 lbs/hr and 9.5 TPY.

3. Visible emissions (VE) from the roof vent shall be less than 20% opacity.

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(2)(6)9. and 40 CFR 60, Appendix A.

C. Top Coating Station and UV Reactor No. 2

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.

2. For PSD tracking, the projected potential VOC/OS emissions are 8.2 lbs/hr and 8.4 TPY.

3. Visible emissions (VE) from the roof vent shall be less than 20% opacity.

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(2)(6)9. and 40 CFR 60, Appendix A.

D. Ultraviolet Reactor Room Operations

1. A material balance scheme shall be employed and include the following:

- a. Initial inventory of all VOC/OS;
- b. Deliveries of all VOC/OS material after the initial inventory;
- c. Quantification of VOC/OS recycled or collected and shipped to an approved waste facility after the initial inventory;
- d. Ending inventory of all VOC/OS (12 calendar months after initial inventory); and
- e. Emissions must be verifiable on a monthly basis.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

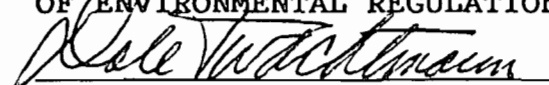
SPECIFIC CONDITIONS:

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

2. Objectionable odors shall not be allowed off plant property.
3. The operations are subject to F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
4. The annual operation report (AOR) will contain the VOC/OS emissions from the UV reactor room operations and are to be based on the material balance scheme.
5. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).
6. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).
7. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.
8. The Southwest District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the Southwest District office within 45 days of test completion pursuant to F.A.C. Rule 17-2.700(7).

Issued this 15 day  
of February, 1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtman, Secretary



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

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

Permit Number: AC 42-154393  
Expiration Date: Dec. 31, 1989  
County: Marion  
Latitude/Longitude: 29°11'00"  
82°15'24"  
Project: Paint Spray Booth (22)  
Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 the construction/installation of eleven (11) new paint spray booths and the permitting of eleven (11) existing paint spray booths. Each booth will be equipped with two exhaust systems that will vent its emissions into the atmosphere through roof vents. Each exhaust system will contain filters that are disposable and a manometer for indicating pressure drop through each filter.

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

The Standard Classification Codes are:

4-02-016-31 Topcoat: solvent-borne (# of vehicles processed)

The sources shall be in accordance with the permit applications, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Applications to Construct Air Pollution Sources, DER Form 17-1.202(1), received September 6, 1988, by the DER's Southeast District.
2. Mr. C. H. Fancy's letter dated October 5, 1988.
3. Mr. Thad Boyd III's letter received November 21, 1988.
4. Technical Evaluation and Preliminary Determination dated January 13, 1989.
5. Mr. Mirza Baig's Interoffice Memorandum dated January 23, 1989, and received January 25, 1989.
6. Mr. Charles E. Dorrity's letter dated January 30, 1989, and received January 31, 1989.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

GENERAL CONDITIONS:

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
Mark III Industries

**Permit No. AC 42-154393**  
**Expiration Date: 12/31/89**

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Permitted hours of operations are 8 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 2,040 hrs/yr.
2. For PSD tracking, the projected potential volatile organic compounds (VOC)/organic solvents (OS) are 4.8 lbs/hr and 4.9 TPY for each paint spray booth. For twenty-two paint spray booths, the projected potential emissions of VOC/OS are 107.8 TPY.
3. Visible emissions (VE) from the roof vents shall be less than 20% opacity.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6)(b)9. and 40 CFR 60, Appendix A.

5. The filters used for filtering paint spray shall be properly maintained and changed when necessary. The manometer used for measuring pressure drop across the filter shall be properly maintained.

6. Objectionable odors shall not be allowed off plant property.

7. The operations of the paint spray booths (22) 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.

8. A material balance scheme shall be employed and include the following:

- a. Initial inventory of all VOC/OS;
- b. Deliveries of all VOC/OS material after the initial inventory;
- c. Quantification of VOC/OS recycled or collected and shipped to an approved receiving facility after the initial inventory;
- d. Ending inventory of all VOC/OS (12 calendar months after initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

Note: It will be assumed that any VOC/OS used and not accounted for by recycling or collected and shipped to an approved receiving facility were emitted into the atmosphere.

9. The annual operation report (AOR) will contain the VOC/OS emissions from the paint spray booth operations and are to be based on the material balance scheme.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

11. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days



PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).

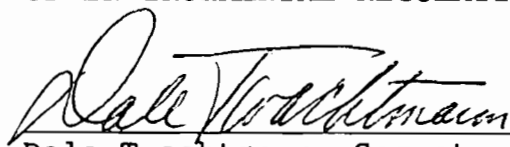
12. The maximum production/processing of vans shall not exceed 3,200 per month.

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

14. The Southwest District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the Southwest District office within 45 days of test completion pursuant to F.A.C. Rule 17-2.700(7).

Issued this 15 day  
of February, 1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtman, Secretary



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

## PERMITTEE:

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

Permit Number: AC 42-154395  
Expiration Date: Dec. 31, 1989  
County: Marion  
Latitude/Longitude: 29°11'00"  
82°15'24"

Project: Woodworking Shop  
Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 the construction of an addition to the existing shop and the installation of a baghouse control system. The baghouse control system is a Pneumafil Dust Collector, Model 13 5-448-12, having a maximum design volumetric flow rate of 68,000 acfm.

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

The Standard Classification Codes are:

- o 3-07-008-98 Sawing: Baghouse Exhaust ( $10^3$  Board feet)
- o 3-07-008-98 Sanding/Planing: Baghouse Exhaust ( $10^3$  Board feet)
- o 3-07-030-98 Sanding/Planing: Operation ( $10^3$  Board feet)

The source shall be 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 September 6, 1988, by the DER's Southeast District.
2. Mr. C. H. Fancy's letter dated October 5, 1988.
3. Mr. Thad Boyd III's letter received November 21, 1988.
4. Mr. David Gaboardi's letter received December 19, 1988.
5. Technical Evaluation and Preliminary Determination dated January 13, 1989.
6. Mr. Mirza Baig's Interoffice Memorandum dated January 23, 1989, and received January 25, 1989.
7. Mr. Charles E. Dorrity's letter dated January 30, 1989, and received January 31, 1989.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

GENERAL CONDITIONS:

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Permitted hours of operations are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.
2. Allowable particulate matter (PM) emissions from the baghouse control system shall not exceed 5.8 lbs/hr and 11.9 TPY. Compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700(6)(b)5. and 40 CFR 60, Appendix A. However and in accordance with F.A.C. Rule 17-2.700(3)(d), a visible emission (VE) standard of 5% opacity (no visible emissions), not to be exceeded, will be imposed in lieu of requiring a PM mass emissions compliance test. A PM mass emissions test will be imposed if the Department has reason to believe that the particulate weight emission standard is not being met.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

SPECIFIC CONDITIONS:

3. The 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)(b)9. and 40 CFR 60, Appendix A.

4. Objectionable odors shall not be allowed off plant property..

5. The woodworking shop 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.

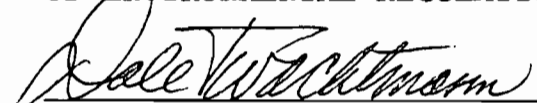
6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

7. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).

8. The Southwest District office shall be notified in writing 15 days prior to source testing pursuant to F.A.C. Rule 17-2.700(2)(a)5. Written reports of the tests shall be submitted to the Southwest District office within 45 days of test completion pursuant to F.A.C Rule 17-2.700(7).

Issued this 15 day  
of February, 1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



Dale Twachtmann, Secretary



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

January 13, 1989

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 construct/install 11 new paint spray booths and permit 11 existing ones, to modify the existing woodworking shop operation, and to modify the existing UV room operations.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/bm

Attachments

cc: B. Thomas, SW Dist  
D. Gaboardi, Mark III Ind.  
W. C. Zegel, P.E., WAR, 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 42-154375  
AC 42-154393  
AC 42-154395

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue permits (copies attached) for the proposed project 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 September 6, 1988, to the Department of Environmental Regulation for permits to construct/install 11 new paint spray booths and permit 11 existing ones, to modify the existing woodworking shop operation, and to modify the existing UV room operations. The proposed project 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.) Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that air construction permits were needed for the proposed work.

Pursuant to Section 403.815, F.S., and DER 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 Permits. The notice must 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. The applicant shall provide proof of publication to the Department, at the address specified, 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, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 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 notice or within 14 days of receipt of this intent, whichever occurs first. 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, Florida Statutes.

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;

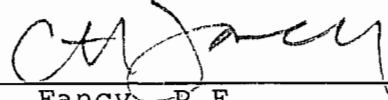
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(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 applicant 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, F.A.C.  
Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



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C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

- B. Thomas, SW Dist.
- D. Gaboardi, Mark III Ind.
- W. C. Zegel, P.E., WAR, 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 January 17, 1989.

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

Martha Albice January 17, 1989  
Clerk Date

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

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 construct/install 11 new paint spray booths and permit 11 existing ones, to modify the existing woodworking shop operation, and to modify the existing UV room operation. The proposed project will occur at the applicant's existing facility in Marion County, Florida. 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. The petition must contain the information set 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, Florida Statutes.

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, F.A.C.

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

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dept. 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. Bill Thomas at the Department's Tallahassee address. All comments mailed 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 Numbers:

AC 42-154375  
AC 42-154393  
AC 42-154395

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Quality Management  
Central Air Permitting

January 13, 1989

## I. Application

### A. Applicant

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

### B. Project and Location

The applicant is applying for construction permits for some proposed new and modified sources and some sources that were constructed without permits, which will allow the doubling of the facility's capacity of processing vehicles (vans) from 1600/year to 3200/year.

The facility is located in Marion County, which is an area deemed attainment for all of the criteria pollutants. The UTM coordinates are Zone 17, 377.81 km East and 3228.77 km North.

### C. Process and Controls

#### 1. Paint Booths

The applicant currently has 11 existing paint spray booths and proposes to install 11 additional booths. The vehicles are painted and cured within a totally enclosed area. The process generates emissions of both VOC (volatile organic compounds) and PM (particulate matter). An attempt is made to recover and recycle waste paint and thinner.

From each paint spray booth, VOC's are emitted through two (2) exhaust systems that vent from the building roof. PM emissions and visible emissions (VE) are minimized using replaceable filters and discharge through the two (2) exhaust systems. A manometer will be used to indicate filter replacement time.

#### 2. Ultraviolet Reactor Room

Prepared wood is first coated with a sealer, cured in an air drying oven and removed. The wood is then coated with a delta sealer, exposed to UV light and removed from the reactor. Finally, the wood is coated with a top coat, exposed to UV light and removed from the reactor. The coating stations, reactors and oven are vented through roof vent stacks to the atmosphere. The production line area between the coating stations to the reactors and oven will be enclosed to prevent fugitive VOC emissions from escaping into the work area. The production line is a continuous track through the coating stations, reactors and oven.



### 3. Woodworking Shop

Hardwood plywood is processed in this facility, which includes cutting and sanding. PM will be collected and transported to a new baghouse control system with an efficiency of 99.9% (vendor's guarantee). The new system will replace an existing cyclone control system.

The Standard Classification Codes are:

#### 1. Woodworking Shop

- o 3-07-008-98 Sawing: Baghouse exhaust ( $10^3$  board ft.)
- o 3-07-008-98 Sanding/Planing: Baghouse exhaust ( $10^3$  board ft.)
- o 3-07-030-98 Sanding/Planing Operations ( $10^3$  board ft.)

#### 2. Ultraviolet Reactor Room

- o 4-02-021-01 Basecoat (tons solvent in coating)
- o 4-02-021-06 Topcoat (tons solvent in coating)
- o 4-02-021-08 Sealer (tons solvent in coating)
- o 4-02-021-33 Ultraviolet Coating ( $10^3$  square ft. product surface area)

#### 3. Paint Booths

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

## II. Rule Applicability

The proposed project is subject to preconstruction review in accordance with Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4.

The application package was deemed complete on November 21, 1988.

The project and existing facility is located in an area that is designated attainment for all of the criteria pollutants. The projected potential pollutant emissions are not subject to review in accordance with F.A.C. Rule 17-2.500, Prevention of Significant Deterioration (PSD), because the potential emissions of any one pollutant are less than 250 TPY.

The following table exhibits the projected potential pollutant emissions from the existing facility and the proposed modification in tons per year (TPY):

Table 1

| Source                  | Projected Potential Pollutant Emissions (TPY) |       |
|-------------------------|---|-------|
|                         | PM  | VOC   |
| Existing Facility       |   |       |
| Woodworking Shop        | 5.95  |       |
| Paint Spray Booths (11) |   | 53.9  |
| UV Room                 |   | 23.0  |
| Proposed Modification   |   |       |
| Woodworking Shop        | 5.95  |       |
| Paint Spray Booths (11) |   | 53.9  |
| UV room                 |   | 23.0  |
| TOTAL:                  | 11.9  | 153.8 |

## Note:

## o Hours of Operation after Modification

1. Woodworking Shop: 16 hrs/day x 5 days/wk x 51 wks/yr  
= 4080 hrs/yr

2. Paint Spray Booths: 8 hrs/day x 5 days/wk x 51 wks/yr  
= 2040 hrs/yr

3. UV Room: 16 hrs/day x 5 days/wk x 51 wks/yr = 4080 hrs/yr

## o Estimate of Emissions

1. Woodworking Shop:

o PM: 68,000 acfm; 10 grains/cfm; 7000 grains/lb

2. UV Reactor Room

## o VOC

a. Sealer Oven - 1210 gals/ 1528 hrs at 5.79 lbs VOC/gal  
delta sealer

b. UV #1 - 2823 gals/1528 hrs at 5.02 lbs VOC/gal sealer

c. UV #2 - 2497 gals/1528 hrs at 5.05 lbs VOC gal top coat

3. Paint Booths

o VOC: 786 gals paint/1020 hrs at 5.0 lbs VOC/gal;  
554 gals thinner/1020 hrs at 7.0 lbs VOC/gal;

Note: Assume minimum of 37.5% paint and thinner recycled/collected and shipped to an approved waste receiving facility.

Since the facility is not on the list of affected major facilities in Table 500-1, F.A.C. Rule 17-2, and the total potential pollutant emissions of all pollutants are not greater than 250 TPY, the emissions are not subject to new source review pursuant to F.A.C. Rule 17-2.500(5). Therefore, the potential pollutant emissions are subject to review in accordance with F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

Since there are no specific emission limiting and performance standard contained in F.A.C. Rules 17-2.600 and 17-2.660, the proposed project will be permitted in accordance with F.A.C. Rules 17-2.610(2), General Visible Emissions Standard; 17-2.610(3), Unconfined Emissions of PM; 17-2.620(1) and (2), General Pollutant Emission Limiting Standards; and, 17-2.700(3)(d), Exceptions and Approval of Alternate Procedures and Requirements.

In accordance with F.A.C. Rule 17-2.610(3) and based on Table 1, the woodworking shop is a minor source of unconfined PM emissions and the installation of a baghouse control system (99.9% efficient of collect dust) is considered reasonable precautions. Therefore, the source is subject to the emission limiting standard pursuant to F.A.C. Rule 17-2.700(3)(d). The visible emission (VE) standard is 5% opacity (no VE), not to be exceeded. Compliance shall be demonstrated using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6)(b)9. and 40 CFR 60, Appendix A.

For the woodworking shop's baghouse control system, the applicant proposed a PM mass emission standard of 5.8 lbs/hr (11.9 TPY) and the Department accepts the request. In accordance with F.A.C. Rule 17-2.700(3)(d), the Department shall require a PM mass emissions compliance test if it has reason to believe that the particulate weight emission standard is not being met (i.e., excessive VE violations). If required, compliance shall be demonstrated using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700(6)(b)5. and 40 CFR 60, Appendix A.

The paint spray booth's exhaust vents and the UV room's reactor and oven exhaust vents are subject to the provisions of F.A.C. Rule 17-2.610(2), General Visible Emissions Standards. The VE standard is less than 20% opacity and compliance shall be demonstrated using EPA Reference Method 9 pursuant to F.A.C. Rule 17-2.700(6)(b)9. and 40 CFR 60, Appendix A.

Sources with a VE standard shall be required to demonstrate compliance annually pursuant to F.A.C. Rule 17-2.700(2)(a)4.

Pursuant to F.A.C. Rule 17-2.620(1)(a), no person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds (VOC) or organic solvents (OS) without applying known or existing vapor emission control devices or systems necessary and ordered by the Department.

For the UV room, the Department feels that it is reasonable to require that the open area between the coating stations (3) and the curing units (2 UV reactors and 1 air drying oven) to be enclosed. The estimated cost is \$3,000.

The facility's VOC/OS emissions shall be accounted for using a material balance scheme and shall be reported in the annual operating report. The scheme will involve the following events for establishing accountability:

1. Initial inventory of all VOC/OS;
2. Deliveries after the initial inventory of any VOC/OS;
3. Quantification of VOC/OS recycled or collected and shipped to an approved receiving facility after the initial inventory;
4. Ending inventory of all VOC/OS (12 calendar months after initial inventory); and,
5. Due to EPA's policy, emissions must be verifiable monthly (30 day period).

Note: It will be assumed that any VOC/OS used and not accounted for by recycling or collected and shipped to an approved receiving facility were emitted into the atmosphere.

Pursuant to F.A.C. Rule 17-2.620(2), objectionable odors shall not be allowed off the property.

The facility is 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.

### III. Summary of Emissions and Air Quality Analysis

#### A. Emission Limitations

Limitations for PM emissions, VOC/OS emissions, and VE are applicable to various sources at the facility and follows:

Table 2

| Source                                   | Emission Limitations |   |
|--|----------------------|---|
| Paint Spray Booth<br>Exhaust Vents (44E) | VE                   | less than 20% opacity                                 |
|  | VOC/OS               | material balance scheme                               |
| UV Room Vents (3)                        | VE                   | less than 20% opacity                                 |
|  | VOC/OS               | material balance scheme                               |
| Woodworking Shop Baghouse<br>Vent        | VE                   | not greater than 5% opacity<br>(no visible emissions) |
|  | PM                   | 5.8 lbs/hr; 11.9 TPY                                  |

B. Air Quality Analysis

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

IV. Conclusion

Again, the use of a baghouse control system to minimize PM emissions from various points in the woodworking shop is considered reasonable precautions.

The employment of a material balance scheme to assess the amount of volatile organic compounds/organic solvents emitted from the various sources at the facility on an annual basis, but verifiable on a monthly basis, is deemed reasonable. Failure to properly install this scheme could necessitate the need to require mass testing all of the exhaust vents for VOC/OS emissions.

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

Based on the information provided by Mark III Industries, the Department has reasonable assurance that the proposed construction/installation of 11 new paint spray booths and the permitting of 11 existing ones, and the modification of the woodworking shop and UV room 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.



M. Thomas



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

## PERMITTEE:

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

Permit Number: AC 42-154375  
Expiration Date: Dec. 31, 1989  
County: Marion  
Latitude/Longitude: 29°11'00"  
82°15'24"

Project: Ultraviolet Reactor  
Room Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 the permitting of the existing ultraviolet (UV) reactor room, which contains three coating stations and three curing units (two UV reactors and one air drying oven), and the construction/installation of an enclosure between each coating station and subsequent curing unit. The enclosure will contain volatile organic compounds/organic solvents and prevent their release into the surrounding working environment. Each curing unit vents its emissions to the atmosphere through roof vents.

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 Ultraviolet Coating ( $10^3$  ft<sup>2</sup> prod. surface area)

The source shall be 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 September 6, 1988, by the DER's Southeast District.
2. Mr. C. H. Fancy's letter dated October 5, 1988.
3. Mr. Thad Boyd III's letter received November 21, 1988.
4. Technical Evaluation and Preliminary Determination dated January 13, 1989.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.



PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

**A. Sealer Coating Station and Air Drying Oven**

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.
2. For PSD tracking, the projected potential volatile organic compounds (VOC)/organic solvents (OS) are 4.6 lbs/hr and 4.7 TPY.
3. Visible emissions (VE) from the roof vent shall be less than 20% opacity.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(2)(6)9. and 40 CFR 60, Appendix A.

**B. Sealer Coating Station and UV Reactor No. 1**

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.

2. For PSD tracking, the projected potential VOC/OS emissions are 9.3 lbs/hr and 9.5 TPY.

3. Visible emissions (VE) from the roof vent shall be less than 20% opacity.

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(2)(6)9. and 40 CFR 60, Appendix A.

**C. Top Coating Station and UV Reactor No. 2**

1. Permitted hours of operation are 16 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 4,080 hrs/yr.

2. For PSD tracking, the projected potential VOC/OS emissions are 8.2 lbs/hr and 8.4 TPY.

3. Visible emissions (VE) from the roof vent shall be less than 20% opacity.

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(2)(6)9. and 40 CFR 60, Appendix A.

**D. Ultraviolet Reactor Room Operations**

1. A material balance scheme shall be employed and include the following:

- a. Initial inventory of all VOC/OS;
- b. Deliveries of all VOC/OS material after the initial inventory;
- c. Quantification of VOC/OS recycled or collected and shipped to an approved waste facility after the initial inventory;
- d. Ending inventory of all VOC/OS (12 calendar months after initial inventory); and
- e. Emissions must be verifiable on a monthly basis.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154375  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

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

2. Objectionable odors shall not be allowed off plant property.
3. The operations are subject to F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
4. The annual operation report (AOR) will contain the VOC/OS emissions from the UV reactor room operations and are to be based on the material balance scheme.
5. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).
6. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 19\_\_\_\_

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

Dale Twachtmann, Secretary



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

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

**Permit Number: AC 42-154393**  
**Expiration Date: Dec. 31, 1989**  
**County: Marion**  
**Latitude/Longitude: 29°11'00"**  
**82°15'24"**  
**Project: Paint Spray Booth (22)**  
**Operations**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 the construction/installation of eleven (11) new paint spray booths and the permitting of eleven (11) existing paint spray booths. Each booth will be equipped with two exhaust systems that will vent its emissions into the atmosphere through roof vents. Each exhaust system will contain filters that are disposable and a manometer for indicating pressure drop through each filter.

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

The Standard Classification Codes are:

4-02-016-31 Topcoat: solvent-borne (# of vehicles processed)

The sources shall be in accordance with the permit applications, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Applications to Construct Air Pollution Sources, DER Form 17-1.202(1), received September 6, 1988, by the DER's Southeast District.
2. Mr. C. H. Fancy's letter dated October 5, 1988.
3. Mr. Thad Boyd III's letter received November 21, 1988.
4. Technical Evaluation and Preliminary Determination dated January 13, 1989.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.



PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

**PERMITTEE:**  
Mark III Industries

**Permit No. AC 42-154393**  
**Expiration Date: 12/31/89**

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Permitted hours of operations are 8 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 2,040 hrs/yr.
2. For PSD tracking, the projected potential volatile organic compounds (VOC)/organic solvents (OS) are 4.8 lbs/hr and 4.9 TPY for each paint spray booth. For twenty-two paint spray booths, the projected potential emissions of VOC/OS are 107.8 TPY.
3. Visible emissions (VE) from the roof vents shall be less than 20% opacity.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

4. The initial and annual compliance tests for VE shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-2.700(6)(b)9. and 40 CFR 60, Appendix A.

5. The filters used for filtering paint spray shall be properly maintained and changed when necessary. The manometer used for measuring pressure drop across the filter shall be properly maintained.

6. Objectionable odors shall not be allowed off plant property.

7. The operations of the paint spray booths (22) 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.

8. A material balance scheme shall be employed and include the following:

- a. Initial inventory of all VOC/OS;
- b. Deliveries of all VOC/OS material after the initial inventory;
- c. Quantification of VOC/OS recycled or collected and shipped to an approved receiving facility after the initial inventory;
- d. Ending inventory of all VOC/OS (12 calendar months after initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

Note: It will be assumed that any VOC/OS used and not accounted for by recycling or collected and shipped to an approved receiving facility were emitted into the atmosphere.

9. The annual operation report (AOR) will contain the VOC/OS emissions from the paint spray booth operations and are to be based on the material balance scheme.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

11. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154393  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 19\_\_\_\_

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

Dale Twachtmann, Secretary

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Permitted hours of operations are 8 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 2,040 hrs/yr.

2. Allowable particulate matter (PM) emissions from the baghouse control system shall not exceed 5.8 lbs/hr and 11.9 TPY. Compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700(6)(b)5. and 40 CFR 60, Appendix A. However and in accordance with F.A.C. Rule 17-2.700(3)(d), a visible emission (VE) standard of 5% opacity (no visible emissions), not to be exceeded, will be imposed in lieu of requiring a PM mass emissions compliance test. A PM mass emissions test will be imposed if the Department has reason to believe that the particulate weight emission standard is not being met.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

3. The 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)(b)9. and 40 CFR 60, Appendix A.

4. Objectionable odors shall not be allowed off plant property.

5. The woodworking shop 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.

6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

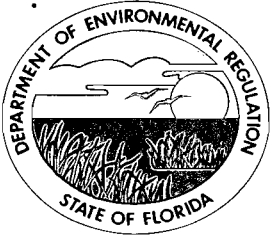
7. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 19\_\_\_\_

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

Dale Twachtmann, Secretary



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

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

Permit Number: AC 42-154395  
Expiration Date: Dec. 31, 1989  
County: Marion  
Latitude/Longitude: 29°11'00"  
82°15'24"

Project: Woodworking Shop  
Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. 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 the construction of an addition to the existing shop and the installation of a baghouse control system.

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

The Standard Classification Codes are:

- o 3-07-008-98 Sawing: Baghouse Exhaust ( $10^3$  Board feet)
- o 3-07-008-98 Sanding/Planing: Baghouse Exhaust ( $10^3$  Board feet)
- o 3-07-030-98 Sanding/Planing: Operation ( $10^3$  Board feet)

The source shall be 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 September 6, 1988, by the DER's Southeast District.
2. Mr. C. H. Fancy's letter dated October 5, 1988.
3. Mr. Thad Boyd III's letter received November 21, 1988.
4. Mr. David Gaboardi's letter received December 19, 1988.
5. Technical Evaluation and Preliminary Determination dated January 13, 1989.



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

**PERMITTEE:**

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

Permit Number: AC 42-154395  
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Operations

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For the construction of an addition to the existing shop and the installation of a baghouse control system.

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The Standard Classification Codes are:

- o 3-07-008-98 Sawing: Baghouse Exhaust (10<sup>3</sup> Board feet)
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5. Technical Evaluation and Preliminary Determination dated January 13, 1989.



PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

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. Nor 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 does not constitute 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 acknowledgement 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, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

6. The permittee shall at all times 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.

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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring 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 notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact 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.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

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 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 arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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 17-4.12 and 17-30.30, 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 is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**GENERAL CONDITIONS:**

- b. The permittee shall retain 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), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be 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 date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

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

**SPECIFIC CONDITIONS:**

1. Permitted hours of operations are 8 hrs/day, 5 days/wk, and 51 wks/yr, for a total of 2,040 hrs/yr.
2. Allowable particulate matter (PM) emissions from the baghouse control system shall not exceed 5.8 lbs/hr and 11.9 TPY. Compliance tests shall be conducted using EPA Reference Method 5 in accordance with F.A.C. Rule 17-2.700(6)(b)5. and 40 CFR 60, Appendix A. However and in accordance with F.A.C. Rule 17-2.700(3)(d), a visible emission (VE) standard of 5% opacity (no visible emissions), not to be exceeded, will be imposed in lieu of requiring a PM mass emissions compliance test. A PM mass emissions test will be imposed if the Department has reason to believe that the particulate weight emission standard is not being met.

PERMITTEE:  
Mark III Industries

Permit No. AC 42-154395  
Expiration Date: 12/31/89

**SPECIFIC CONDITIONS:**

3. The initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rules 17-2.700(6)(b)9. and 40 CFR 60, Appendix A.

4. Objectionable odors shall not be allowed off plant property.

5. The woodworking shop 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.

6. The permittee, for good cause, may request that the construction permit be extended. Such a request shall be submitted to the BAQM prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

7. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, 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. 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 19\_\_\_\_

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Dale Twachtmann, Secretary

ATTACHMENT 1

Available Upon Request

ATTACHMENT 2



*Florida Department of Environmental Regulation*

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-24

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 5, 1988

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:

Re: Completeness Review of Applications to Construct Air  
Pollution Sources - Construction Permit Nos.:  
AC 42-154375 (Sealer); AC 42-154379 (UV Reactor #1);  
AC 42-154388 (UV Reactor #2); AC 42-154393 (Paint  
Booths #4-25); and, AC 42-154395 (Woodworking Facility)

The Department has received and reviewed the above referenced application packages for air construction permits. Based on the review, the application packages have been deemed incomplete. Therefore, please submit the following information to the DER's Bureau of Air Quality Management office, including all assumptions, calculations and reference material, in order to ascertain their status:

A. AC 42-154375, -154379, and -154388

1. Calculate the potential pollutant emissions on the basis of the requested operating parameters, which are 16 hrs/day and 255 days/year.
2. Based on the September 28, 1988 tour of the facility, VOC (volatile organic compounds/solvents) were detected in the working environment of the UV reactor area. What reasonable precautions can be taken to prevent/minimize VOC emissions into the work area from the application/spray area to the entrance into each of the UV/curing booths?



Mr. Roy . Boyd, III  
Page Two  
October 5, 1988

B. AC 42-154393

1. Provide support data (analyses) of the recycled waste stream material (waste paint and thinner) that was used to establish the assumption that "37.5%" of total VOC used is recycled.
2. Provide the name(s) and address(es) of the vendor(s) used for recycling your waste streams.
3. What is the maximum gallons of paint and thinner used for any one month during the last two years of operation?
4. Provide the schedule and/or criteria for replacing the filters used for filtering paint spray particulate matter (PM).
5. For the exhaust systems of the existing paint booths, what measures of control can be taken through a retrofit to reduce/minimize VOC/solvent emissions into the atmosphere from their stacks and what are the associated costs (estimated)?
6. For the exhaust systems of the proposed new paint booths, what measures of control can be taken to reduce/minimize VOC/solvent emissions into the atmosphere from their stacks and what are the associated costs (estimated)?

C. AC 42-154395

1. Provide the stack geometry and flow characteristics for the proposed new baghouse control system (page 6 of 12 of the application form, Section III.H.).
2. Since the application of the "Process Weight" equation is not appropriate in this case to establish an allowable PM limit for the proposed process, calculate the PM emissions in lbs/hr and is to be based on the vendors grain loading guarantee (gr/dscf). Because a visible emissions test will be used to verify compliance on a regular basis, a one time PM mass emissions test will be required to establish the actual grain loading during maximum operations.


Mr. Roy T. Boyd, III  
Page Three  
October 5, 1988

D. General

1. Since the paint booths (#4-25) are identical sources, the appropriate fee for the 22 sources is \$1000.00. Therefore, a refund in the amount of \$1200.00 will be processed by the Department.

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,

*for*   
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/BM/s

cc: B. Thomas, SW District  
W. C. Zegel, P.E., WAR, Inc.  
D. Gaboardi, Mark III Ind.  
J. Pallas, U.S. EPA, Region IV  
B. Hewitt, Esq., DER

ATTACHMENT 3

11-21-88 @ 2:37  
called D. Guaboardi @ Mark III Inc  
told him that the letter was red.  
RAM



RECEIVED

NOV 21 1988

DER-BAQM

November 18, 1988

Mr. C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: Additional information requested for Permits Nos: AC42-154375 (Sealer); AC42-154379 (UV Reactor #1); AC42-154388 (UV Reactor #2); AC42-154393 (Paint Booths #4-25); and AC42-154395 (Woodworking Facility)

A. AC 42-154375, 42-154379 and 42-154388.

1. The formulations for the calculations in this section were the same as the ones used in the original permit, with the exception of using 16hrs/day instead of 8hrs/day, and 255days/yr. Using these operating parameters, the new calculations yielded the following results.
  - a) AC 42-154375 (Sealer) Potential and Actual Emissions: 8.2T/yr.
  - b) AC 42-154379 (UV #1) Potential and Actual Emissions: 18.9T/yr.
  - c) AC 42-154388 (UV #2) Potential and Actual Emissions: 18.9T/yr.
2. One precaution that could be taken to prevent/minimize VOC emissions into the work areas near the UV spray booths would be to enclose the areas between the UV spray booths and curing booths with flexible strip curtains. The associated costs for such a project would be approximately \$3,000.00 to enclose the two areas affected.

Currently, there are no concrete plans to increase the total number of UV spray booths beyond the two that are now in operation.



B. AC 42-154393

1. Our records indicate that during a six-week period in July and August of 1988, we recycled 1,250 gallons of waste paint and thinner and recovered 513 gallons of useable thinner. This represents a recovery rate of 41%. The recovery rate of 37.5% listed in the application was a conservative estimate of our rate of recovery.
2. The name and address of the vendor used for recycling our waste streams is:  
M & M Chemical and Equipment Co., Inc.  
Route 3 Box 285-B  
Atalla, Al. 35954
3. During the last two years of operation, the maximum gallons of paint and thinner used in any one month is 900 gallons of paint and 477 gallons of thinner.
4. The filters used for filtering paint spray particulate matter are changed on an as-needed basis, which is determined by readings obtained from the manometer located on each paint spray booth. While a reading in the .65 - .95 range is considered acceptable, these filters are changed out when a reading of .90 is observed. The unit of measure is inches of water in the manometer. As a general rule of thumb, the filters are thus changed every 3-4 days.
5. After consulting with our vendors, we have determined that our existing paint booths have the best systems available to reduce/minimize VOC/solvent emissions into the atmosphere. To the best of our knowledge, there is nothing available to retrofit to our existing paint booths that would improve their efficiency in reducing/minimizing VOC/solvent emissions.
6. The exhaust systems that will be installed on the proposed new paint booths will be the same as the ones used for the existing booths. Therefore, the answer to #5 would also apply here.



C. AC 42-154395

1. The proposed new baghouse control system has a round stack, 48 inches in diameter (See Exhibit A & B). It will handle 68,000 CFM with a velocity of 5,400 FPM or 90ft/sec.
2. Based on the vendor's grain loading guarantee, the Particulate matter emissions should not exceed 5/8lbs/hr. This is based on potential emissions of 5,800 lbs/hr., and an efficiency rating of at least 99.9% for the proposed dust removal system (See Exhibit C). Potential emissions were based on the proposed system being rated at 68,000 CFM, on these being 10 grams of PM/CFM and 7,000 grains/lb.

grains

If you have any further questions, please call me at (904) 732-5878 or write to me at the address below.

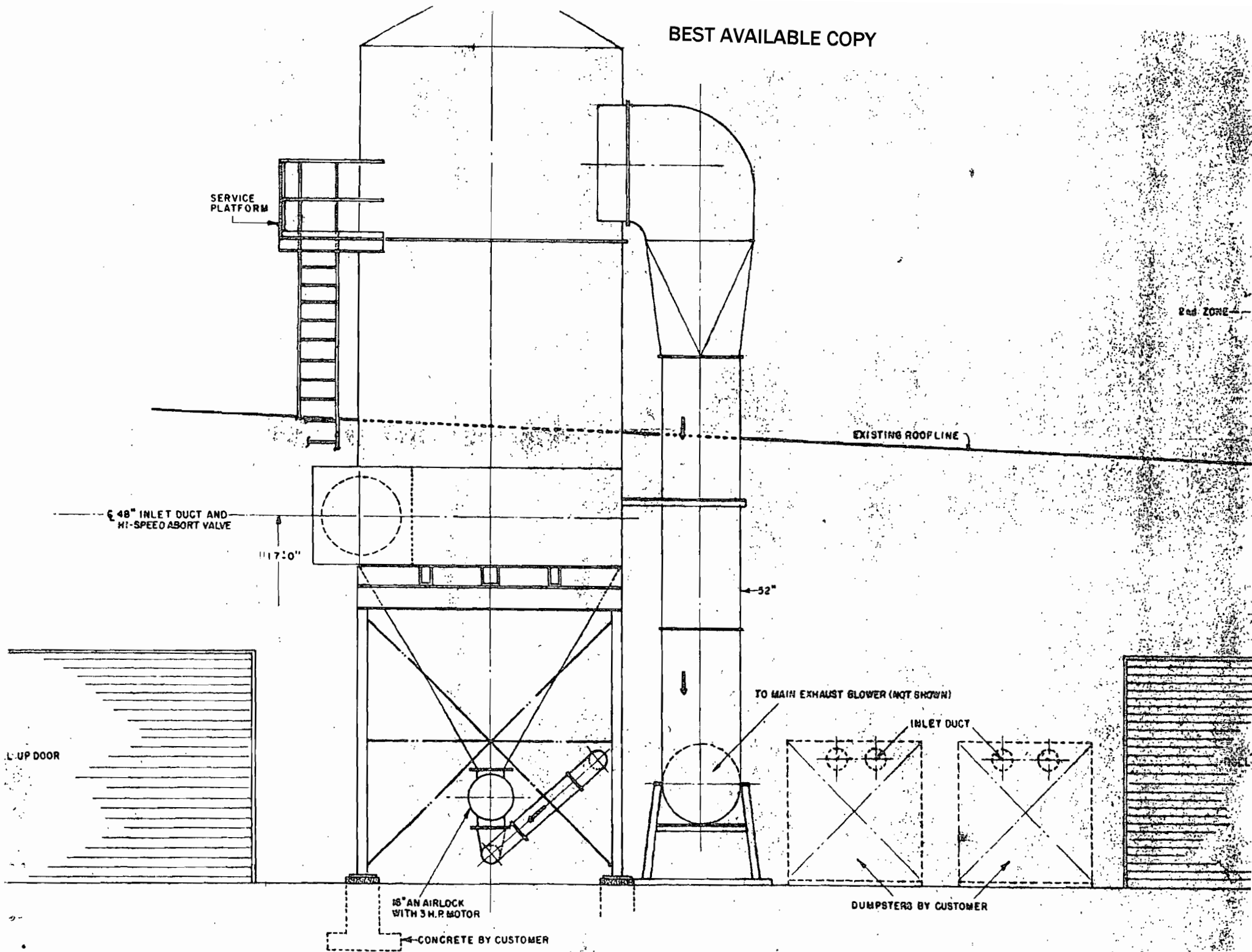
Sincerely,

Thad Boyd, III  
Chief Executive Officer

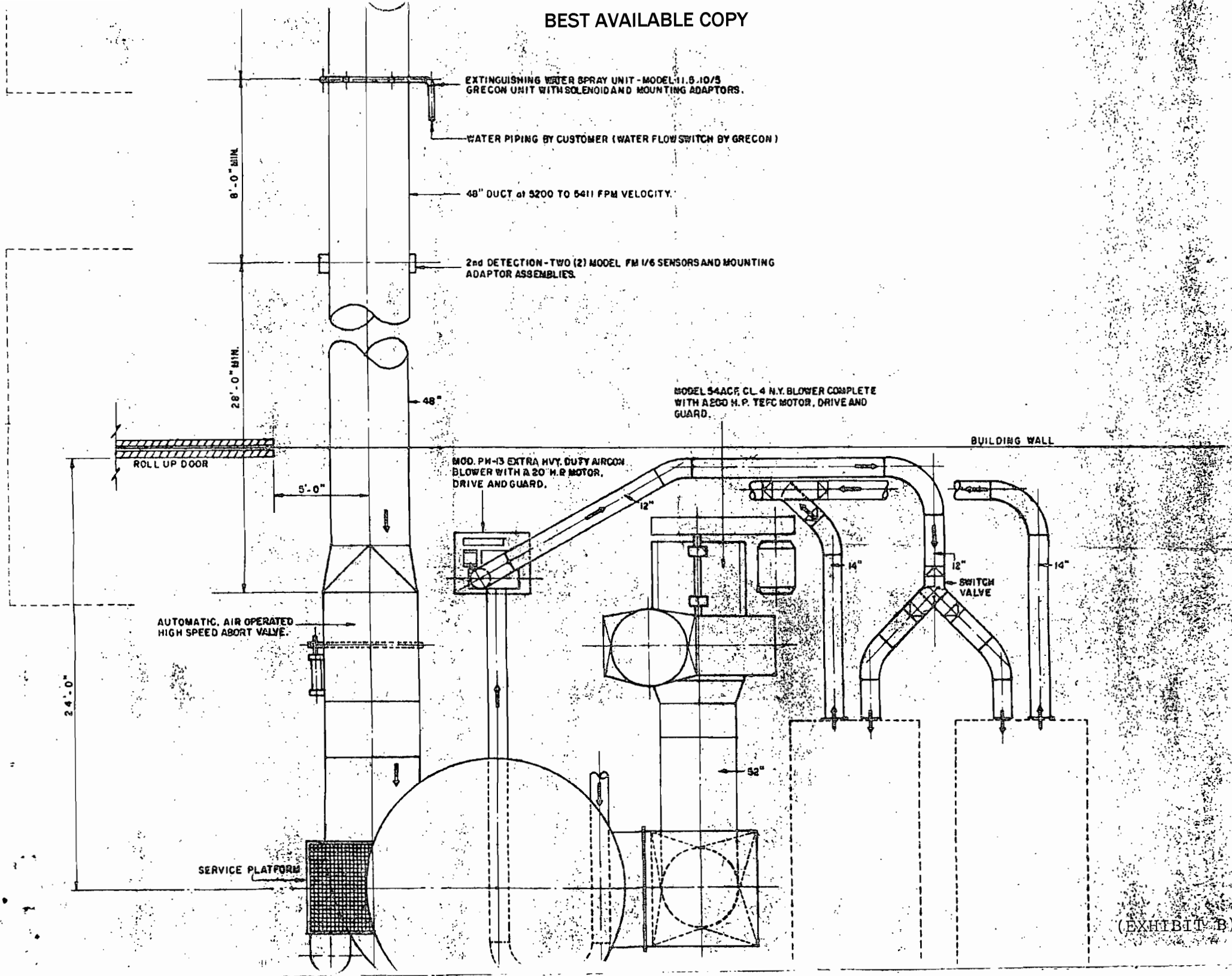
TB/dj

cc: Mr. Bill Thomas  
Southwest District  
4520 Oak Fair Blvd.  
Tampa, Florida 33610-7347

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(EXHIBIT A)







CORPORATION

AIR POLLUTION CONTROL  
DUST COLLECTION SYSTEMS  
PNEUMATIC CONVEYING  
STEEL FABRICATORS-ERECTORS

November 7, 1988

Mark III Industries  
P.O. Box 2525  
Ocala, Florida 32678

Attn: Mr. Joe Krim

Re: Your letter dated 11-3-88 regarding the dust control system

Dear Joe:

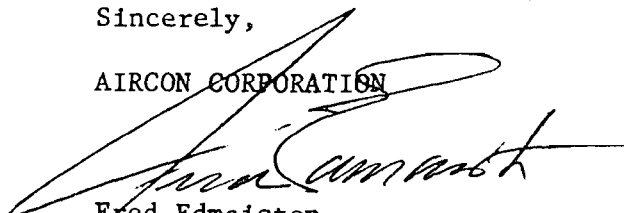
Below please find the information as you requested per the above correspondence.

1. Time frame for installation
  - a. Delivery data: Aircon shall begin installation approximately 30 days after receipt of purchase order and down-payment.
  - b. Installation shutdown: There should be minimum interference with the production.
  - c. Installation time: Approximately four (4) weeks
2. Dust collector shall be painted per chip as sent to Pneumafil by John Lanning of your company.
3. Percentage of clean air from this unit. This unit shall operate at 99.9% efficient of "collected" dust. The efficiency of the overall system relies strongly upon the personnel that operates the system. Although there is no way of knowing exactly how much dust will not be collected at the hood areas; there shall be a "tremendous" difference inside the production areas. All the equipment to be installed is the most modern known to this industry and should operate accordingly.

I appreciate the opportunity to work with you on this project and look forward to meeting with you on Thursday of this week.

Sincerely,

AIRCON CORPORATION

  
Fred Edmaiston  
Executive Vice President

FE:dh

(EXHIBIT C)

ATTACHMENT 4

12-16-88  
Ocala, FL



RECEIVED

DEC 19 1988

DER-BAQM

December 15, 1988

Mr. Bruce Mitchell  
Bureau of Air Quality Management  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

As per our telephone conversation of December 15, 1988, the last sentence of paragraph C. 2., of Mr. Boyd's letter of November 18, 1988, should have read "...on these being 10 grains of PM/CFM and 7,000 grains/lb." Please make the appropriate correction in your copy of the letter.

Should you have any further questions, please call me at (904) 732-5878, or write me at the address below.

Sincerely,

David Gaboardi  
Safety/Training Director

DG/dj.

Bruce Mitchell }  
CHF/BT } 12-19-88 RRL  
Bill Thomas (SWD:J)