

Check Sheet

Company Name: MARK III INDUSTRIES

Permit Number: AC 42-222363 , AC 42-2 22347

PSD Number: _____

Permit Engineer: _____

Application:

- Initial Application
 - Incompleteness Letters
 - Responses
 - Waiver of Department Action
 - Department Response
 - Other

Cross References:

- ~~XXXXXXXXXX~~
-
-

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Roy T. Boyd III
 Chief Executive Officer
 Mark III Industries
 5401 N.W. 44th Avenue
 Ocala, FL 32675

4a. Article Number
 P 230 523 755

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

7. Date of Delivery
 8-5-93

5. Signature (Addressee)

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

6. Signature (Agent)
Lina Butler

PS Form 3811, December 1991 ★U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 230 523 755



Receipt for Certified Mail

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

Sent to Mr. Roy T. Boyd III	
Street and No. Mark III Ind. 5401 NW 44th Ave.	
P.O., State and Zip Code Ocala, FL 32675	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8-2-93 Permit: AC42-222347 AC42-222353	

PS Form 3800, June 1991



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

July 30, 1993

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: Amendment to Construction Permits
AC 42-222347: Ultraviolet Reactor Room Operations
AC 42-222353: Paint Spray Booth Operations

The Department has reviewed the letter received on June 21, 1993, from Mr. Lloyd Stebbins, P.E. and representing Mark III Industries, which requested an amendment to the above referenced construction permits. Based on discussions with the Southwest District office and a review of the proposed facility changes, the request is deemed acceptable and the following will be changed and/or added:

A. AC 42-222347: Ultraviolet Reactor Room (UVR) Operations

Cover Page (new)

The UVR operations shall consist of three coating spray booths (CSB) and their associated straight line conveyor systems, which replaces the existing system (one straight line conveyor system and associated CSB and one oval conveyor line with two CSBs). The oval conveyor line will be moved to the New Paint Shop and two of the existing CSBs will be replaced with new ones. There will be no change in the number of emission sources/units by the changes reflected in this amendment.

B. AC 42-222353: Paint Spray Booth (PSB) Operations

Cover Page (new)

The PSB operations shall consist of a total of 18 PSBs. The New Paint Shop will have a change in the alignment of a stack of one of its existing PSB. Three existing PSBs from the Old Paint Shop will be moved to the Tire Bay/Running Boards Building. There will be no change in the number of emission sources/units by the changes reflected in this amendment.

Mr. Roy T. Boyd III
Letter Amendment to AC 42-222347 & -222353
July 30, 1993
Page 2

C. Attachments to be Incorporated:

- o Mr. Lloyd H. Stebbins's letter received June 21, 1993.
- o FAX received from Mr. Lloyd Stebbins on July 22, 1993.
- o Mr. F. Joe Krim, Jr.'s letter and processing fee received July 28, 1993.

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

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number(s) 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 amendment. Persons whose substantial interests will be affected by

Mr. Roy T. Boyd III
Letter Amendment to AC 42-222347 & -222353
July 30, 1993
Page 3

any decision of the Department with regard to the request/application 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 the amendment issuance in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter amendment must be attached to the construction permits, Nos. AC 42-222347 and AC 42-222353, and shall become a part of the permits.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

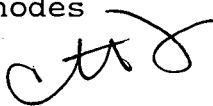
HLR/RBM/rbm.

Attachments

cc: B. Thomas, SWD
L. Stebbins, P.E., REI
D. Beason, Esq., DER
D. Gaboardi, M3I

Memorandum

**Florida Department of
Environmental Protection**

TO: Howard L. Rhodes
FROM: Clair Fancy 
DATE: July 30, 1993
SUBJ: Approval of an Amendment to Construction Permits
AC 42-222347: Ultraviolet Reactor Room Operations
AC 42-222353: Paint Spray Booth Operations
Mark III Industries

Attached for your approval and signature is an amendment to construction permits prepared by the Bureau of Air Regulation for the above referenced company. The purpose of the amendment is to recognize physical plant changes (i.e., relocation of emission sources/units) within the facility, with no change in the total number of emission sources/units and allowable emissions.

Mark III Industries is a major VOC emitting facility, which provides both exterior and interior detailing of various vehicles (i.e., vans and trucks). There are a total of 18 paint spray booths (PSBs) associated with the PSB operations and 3 coating spray booths and associated conveyor lines associated with the UV Reactor Room operations. The vent stack alignments for all the booths are such that a manifold could be retrofitted for control purposes. Compliance is demonstrated by a material balance scheme. The facility is located at 5401 N.W. 44th Avenue, Ocala, Marion County, Florida. Marion County is an attainment area for all pollutants.

I recommend your approval and signature.

HLR/BM/rbm



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Roy Boyd / Lloyd Stebbins

DATE: 7/30/93 PHONE: _____

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: CLC for Bruce Mitchell
DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: Permit Revision - Mark III Indust.

MESSAGE CONFIRMATION

JUL-30-'93 FRI 18:04

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
542	07-30	18:01	00:02:42	904 636 0702		04	00

PHONE: 488-1344

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: Jim McDonald / Harry Kerns

DATE: 2-27-93 PHONE: _____

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: proposal from Mark III Ind/consultant - I
propose to do this request as an amendment to
the existing CBs, since there will be the same
number of emitting units and no change in
the allowables - please give me a call and let's
discuss - Thanks,

PHONE: 904-488-1344

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

MESSAGE CONFIRMATION

JUL-27-'93 TUE 11:32

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
506	07-27	11:29	00°02'42			04	00

MESSAGE CONFIRMATION

JUL-27-'93 TUE 11:28

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
505	07-27	11:27	00°00'42	813 620 6092		01	00

MESSAGE CONFIRMATION

JUL-27-'93 TUE 11:26

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
504	07-27	11:24	00°02'19	813 620 6092		03	00

RUST ENVIRONMENT &
INFRASTRUCTURE

FAX TRANSMISSION SHEET

DATE: 7/22/93

Number of Pages Following this Sheet: 1

Please Deliver the Following Documents:

TO: Bruce Mitchell

COMPANY: Reo Mark III

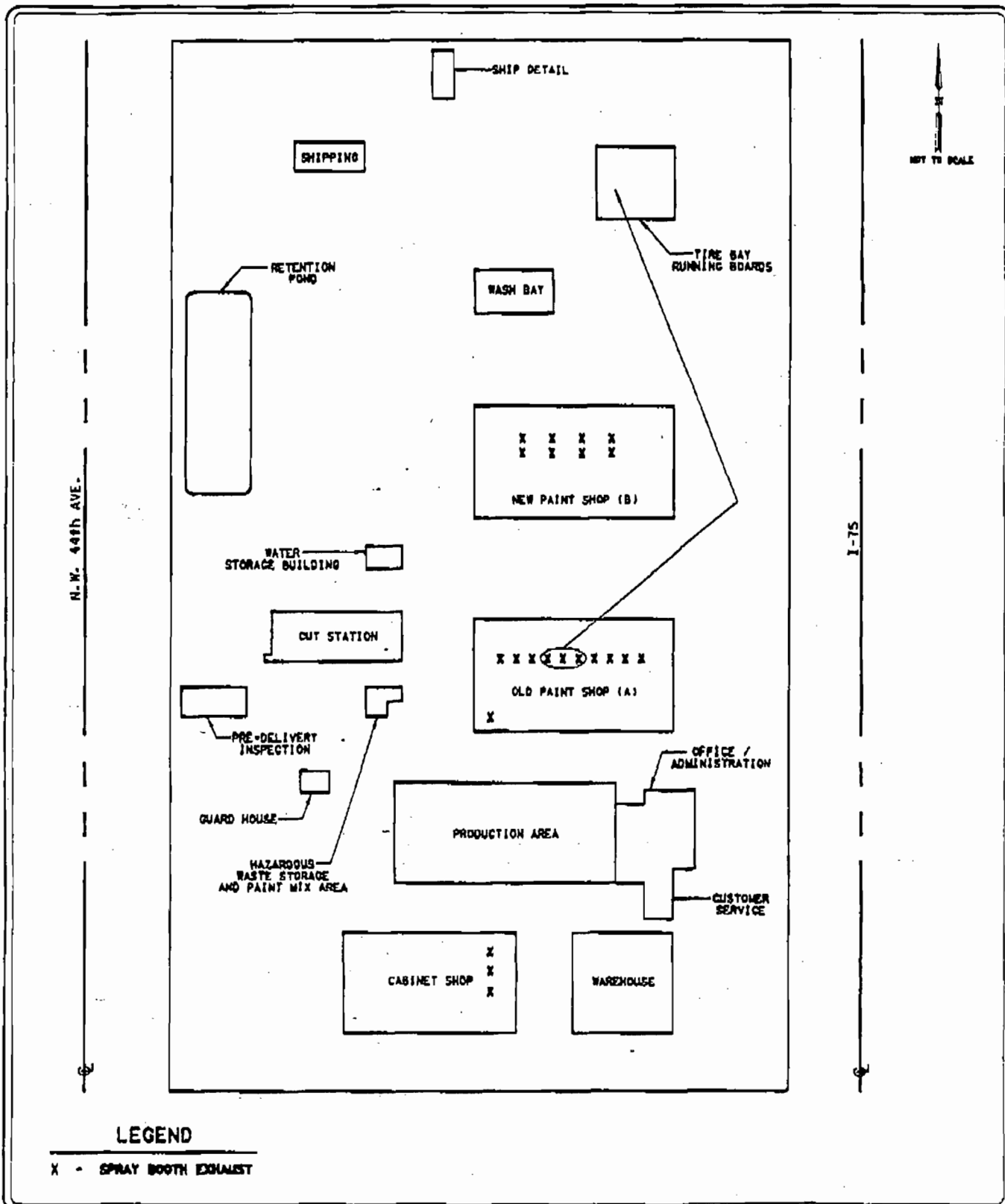
FAX NUMBER: 904/922-6979

FROM: Lloyd Stebbins

RE: PLOT

IF ALL DOCUMENTS ARE NOT RECEIVED OR ARE NOT LEGIBLE, PLEASE CALL
904 - 448 - 3131 FOR ASSISTANCE OR CLARIFICATION.

BEST AVAILABLE COPY



RUST ENVIRONMENT & INFRASTRUCTURE	ENVIRONMENTAL AND GROUNDWATER SERVICES	
	DRN. BY: DBB DWG. NO.	DATE: / /
	PROJECT NAME: MARK III INDUSTRIES	NUMBER:



Luxury Vans & Trucks

#1 C H E V Y • #1 D O D G E • #1 F O R D

RECEIVED

JUL 28 1993

July 27, 1993

Division of Air
Resources Management

Ms. Patty Adams
FDEP/DARM
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: AC 42-222347
AC 42-222353

Dear Ms. Adams:

Enclosed is a check in the amount of \$500.00 to cover the cost of amendments to the above referenced air permits.

Respectfully,
MARK III INDUSTRIES, INC.

F. Joe Krim, Jr.
Executive Vice President

cb

enc.

cc: Bruce Mitchell, FDEP
Lloyd Stebbins, Rust
M. 7/28/93

June 18, 1993

RECEIVED

JUN 21 1993

Division of Air
Resources Management

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Construction Permits Nos.
AC 42-222347; Ultraviolet Reactor Room Operations
AC 42-222353; Paint Spray Booth Operations

Dear Mr. Mitchell:

As a result of continuing rapid growth at Mark III Industries, it has become important to keep you advised of certain physical changes at the site which will improve operating efficiency but will not increase VOC emissions. The attached plot plan will help clarify the changes at the site.

Currently the Cabinet Shop (Ultraviolet Reactor Room Operations - Permit No. AC 42-222347) houses two (2) conveyor systems including a straight line conveyor with a single paint spray booth and an oval-shaped conveyor system with two (2) paint spray booths for a combined total of three (3) paint spray booths within that building. The oval-shaped conveyor will be moved from the Cabinet Shop to the New Paint Shop. Two (2) new straight line conveyors will be installed in the Cabinet Shop. In addition, two (2) existing paint spray booths will be removed and replaced with two (2) new ones that will allow for more efficient materials utilization through the reclamation and recycling of overspray. The net effect of these changes is that there will be no increase in the usage of VOC-bearing coatings and no increase in VOC emissions from the Cabinet Shop. Accordingly, there is no need to modify the construction permit for the Ultraviolet Reactor Room.

As a result of the anticipated adjustments to the process, it will become necessary to reposition at least one stack in the New Paint Shop. There will be no change in the total number of stacks in the New Paint Shop and no increase in emissions.

Finally, three (3) paint spray booths identified in the Old Paint Shop will be moved approximately 970 feet north to the Tire Bay/Running Boards Building. The relocation of the three (3) paint spray booths will improve overall operating efficiency. The paint spray booths are being relocated on the same contiguous site. There will be no change in the usage of VOC-bearing coating materials and no increase in the permitted emissions of VOCs. Accordingly, it is not necessary to modify the Paint Spray Booth Permit No. AC 42-222353.



Mr. Bruce Mitchell
Page Two
June 18, 1993

We are pleased to keep you advised of these process improvements and respectfully request that you issue a corresponding minor revision to each of the permits.

Very truly yours,



Lloyd H. Stebbins, P.E., DEE
Environmental Operations Director

Professional Engineering Registration No. PE-0031838



FAX TRANSMISSION SHEET

DATE: 7/22/93

Number of Pages Following this Sheet: 1

Please Deliver the Following Documents:

TO: Bruce Mitchell

COMPANY: Reo Mark III

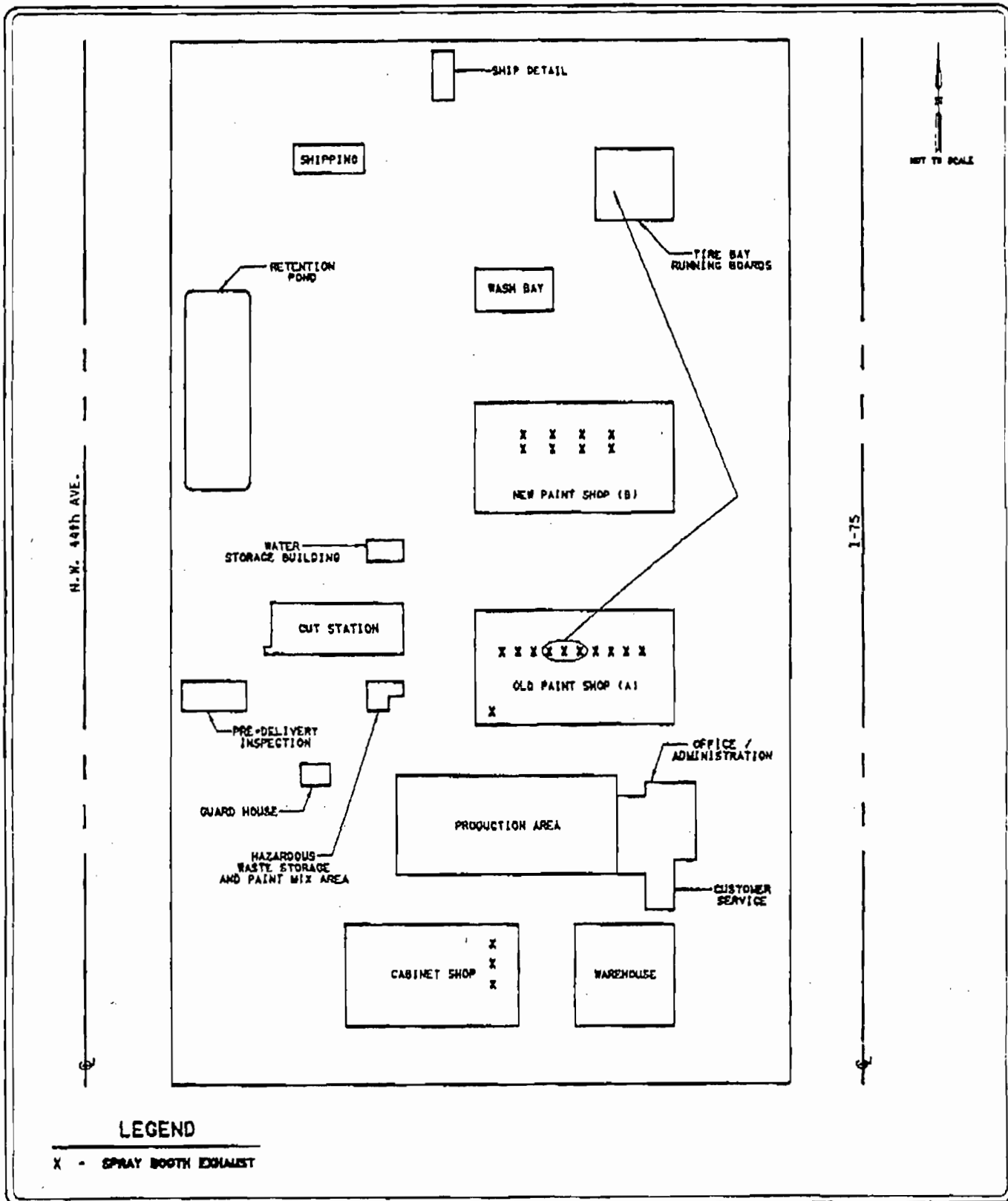
FAX NUMBER: 904/922-6979

FROM: Lloyd Stebbins

RE: PLOT

IF ALL DOCUMENTS ARE NOT RECEIVED OR ARE NOT LEGIBLE, PLEASE CALL
904 - 448 - 3131 FOR ASSISTANCE OR CLARIFICATION.





LEGEND

X - SPRAY BOOTH EXHAUST

RUST ENVIRONMENT & INFRASTRUCTURE

ENVIRONMENTAL AND GROUNDWATER SERVICES

DRN. BY: DBB DWG. NO.

DATE: / /

PROJECT NAME: MARK III INDUSTRIES

NUMBER:

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Roy T. Boyd III Chief Executive Officer Mark III Industries 5401 N.W. 44th Avenue Ocala, FL 32675		4a. Article Number P 062 922 020	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
		7. Date of Delivery <i>12/28/92</i>	
5. Signature (Addressee) <i>Mr. Roy T. Boyd III</i>		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent)			

PS Form 3811, November 1990 *U.S. GPO: 1991-287-066 **DOMESTIC RETURN RECEIPT**

P 062 922 020



Receipt for Certified Mail

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

Sent to	
Mr. Roy T. Boyd III, Mark III	
Street and No. Industries	
5401 N.W. 44th Ave.	
P.O., State and ZIP Code	
Ocala, FL 32675	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 12-28-92	
Permit: AC 42-222347	
AC 42-222353	

PS Form 3800, June 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permits by:

DER File No. AC 42-222347
AC 42-222353
Marion County

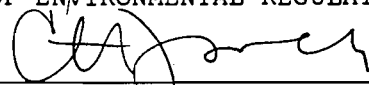
Mr. Roy T. Boyd III
Chief Executive Officer
Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675

Enclosed are Permit Numbers AC 42-222347 and AC 42-222353 to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations at the Mark III Industries facility in Marion County, Florida. These permits are issued pursuant to Section(s) 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

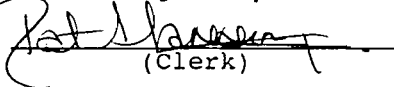

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12-28-92 to the listed persons.

Clerk Stamp

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


(Clerk)

12-28-92
(Date)

Copies furnished to:

B. Thomas, SW District
D. Gaboardi, M3I
L. Stebbins, P.E., M&A, Inc.
J. Harper, EPA

Final Determination

Mark III Industries
Marion County
Ocala, Florida

Construction Permit Nos.
AC 42-222347
AC 42-222353

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

December 24, 1992

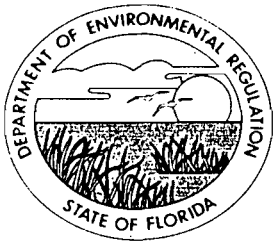
Final Determination

Mark III Industries

Marion County

The construction permit application packages have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Ocala Star-Banner on December 6, 1992. The Technical Evaluation and Preliminary Determination of the construction permits was distributed on December 2, 1992, and available for public inspection at the Department's Southwest District office and the Department's Bureau of Air Regulation office.

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



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 42-222347

Expiration Date: Dec. 31, 1994

County: Marion

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

Project: Ultraviolet Reactor Room
Operations Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4; F.A.C. Chapters 17-210, 17-212, 17-272, 17-275, 17-296, and 17-297; and, 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For a modification to the existing Ultraviolet Reactor Room (UVR) operations, to delete the federally enforceable VOC (volatile organic compounds/organic solvents) hourly limitation and to impose a quarterly operation report requirement because of the synthetic minor facility qualifications (i.e., 249.0 TPY VOC).

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and processing fee received December 1, 1992.
2. Technical Evaluation and Preliminary Determination dated December 2, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Ultraviolet Reactor Room (UVR) operations shall not exceed 125.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-296.310(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-297.401(9) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-296.320(2).
6. The UVR operations are subject to the provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The UVR operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-297.340(1)(i). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-297.570(2).
9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
 - a. Initial inventory of all VOCs;
 - b. Deliveries of all VOC material after the initial inventory;
 - c. Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

SPECIFIC CONDITIONS:

- d. Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

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

10. Due to a synthetic minor facility designation (i.e., 249.0 TPY VOC), a quarterly operation report shall be submitted to the Department's Southwest District office by the 10th of the month following the last quarter of operations accounting for the VOC emissions from the UVRP operations; and, the report shall be accountable on a monthly basis. The quarters shall be January - March; April - June; July - September; and, October - December.

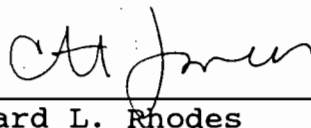
11. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.

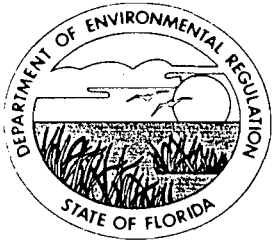
12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

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

Issued this 28 day
of December, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for 
Howard L. Rhodes
Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 42-222353

Expiration Date: Dec. 31, 1994

County: Marion

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

**Project: Paint Spray Booth
Operations Modification**

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4; F.A.C. Chapters 17-210, 17-212, 17-272, 17-275, 17-296, and 17-297; and, 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For a modification to the existing Paint Spray Booth (PSB) operations, which will allow an increase in the allowable VOC (volatile organic compounds/organic solvents) emissions from 100 TPY to 124 TPY. The facility will become a synthetic minor facility (i.e., 249.0 TPY VOC).

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and processing fee received December 1, 1992.
2. Technical Evaluation and Preliminary Determination dated December 2, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Paint Spray Booth (PSB) operations shall not exceed 124.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-296.310(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-297.401(9) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-296.320(2).
6. The PSB operations are subject to the provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The PSB operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-297.340(1)(i). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-297.570(2).
9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
 - a. Initial inventory of all VOCs;
 - b. Deliveries of all VOC material after the initial inventory;
 - c. Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

SPECIFIC CONDITIONS:

- d. Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

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

10. Due to a synthetic minor facility designation (i.e., 249.0 TPY VOC), a quarterly operation report shall be submitted to the Department's Southwest District office by the 10th of the month following the last quarter of operations accounting for the VOC emissions from the PSB operations; and, the report shall be accountable on a monthly basis. The quarters shall be January - March; April - June; July - September; and, October - December.

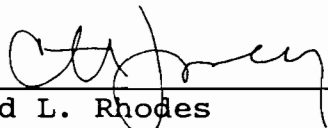
11. The vent stacks shall be installed such that pollutant emissions exit in the vertical plane.

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

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

Issued this 28 day
of December, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Howard L. Rhodes
Director
Division of Air Resources
Management

CM: P 277 509 895
PM: 12-11-92
Ocala, FL



December 10, 1992

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

Re: AC 42-222347
AC 42-222353

Dear Mr. Fancy:

Enclosed is the proof of publication for the "Intent To Issue" for the above referenced permits.

Respectfully,
Mark III Industries, Inc.

A handwritten signature in cursive script that reads "David Gaboardi".

David Gaboardi
Director of Environmental Control

DG/ch

Enclosure

RECEIVED

DEC 14 1992

Division of Air
Resources Management

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

STATE OF FLORIDA,
 COUNTY OF MARION.

Before me the undersigned authority personally appeared Foy Maloy, who on oath says that he is Advertising Director 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 #C3005 Notice Of Intent _____ in the _____ Court, was published in said newspaper in the issues of December 6, 1992

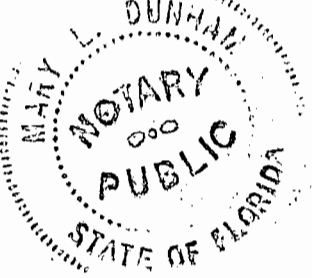
Affiant further says that the said THE OCALA STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post 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.

DSJ

Sworn to and subscribed before me this 7th day of December, A.D., 19 92

Mary L Dunham
 (Seal) Notary Public

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: Feb. 26, 1995.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.



to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.
 No. C3005 — December 6, 1992

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

AC 42-222347: Ultraviolet Reactor Room Operations
 AC 42-222353: Paint Spray Booth Operations

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

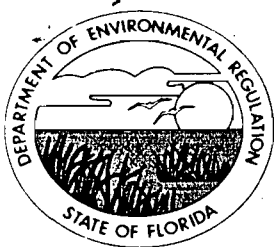
A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received)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

The Petition shall contain the following information:

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

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

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
 Department of Environmental Regulation
 Bureau of Air Regulation
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400
 Department of Environmental Regulation
 Southwest District
 3804 Coconut Palm Drive
 Tampa, Florida 33619-8218
 Any person may send written comments on the proposed action



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

NAME(S): David Gaibaldi

DEPARTMENT/COMPANY: Mark 3 Ind.

DATE: 12-2-92

PHONE: 904-351-1017

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

BUREAU: of Air Regulation

OFFICE PHONE: 904-488-1344 FAX PHONE: (904)922-6979

SENDER: Sam

COMMENTS: PN not before Saturday, the 5th

HAVE A NICE DAY!

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

AC 42-222347: Ultraviolet Reactor Room Operations
AC 42-222353: Paint Spray Booth Operations

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

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

The Petition shall contain the following information:

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

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

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

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

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

Department of Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

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

MESSAGE CONFIRMATION

DEC-02-'92 WED 09:45

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
066	12-02	09:43	00'02'05	9047324203		03	00

P 062 921 928



Receipt for Certified Mail

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

Sent to <i>Roy T. Boyd</i>	
Street and No. <i>Mark III</i>	
P.O. State and ZIP Code <i>Ocala, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>AC 42-222347</i> <i>" " " 353</i>	<i>12-2-92</i>

PS Form 3800, June 1991

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Roy T. Boyd, III, CEO
Mark III Industries
5401 NW 44th Ave
Ocala, FL 32675

4. Type of Service:	Article Number
<input type="checkbox"/> Registered	<i>062921928</i>
<input checked="" type="checkbox"/> Certified	<i>0</i>
<input type="checkbox"/> Express Mail	<i>0</i>
<input type="checkbox"/> Insured	<i>0</i>
<input type="checkbox"/> COD	<i>0</i>

Always obtain signature of addressee or agent and **DATE DELIVERED:** *12-2-92*

5. Signature - Addressee
X

6. Signature - Agent
X *Proctor Fejo*

7. Date of Delivery
12/2/92

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

DOMESTIC RETURN RECEIPT

File Copy



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor Carol M. Browner, Secretary

December 2, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Boyd:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permits for Mark III Industries to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations. The modifications will result in the facility being designated as a synthetic minor facility (i.e., 249.0 TPY VOCs (volatile organic compounds/organic solvents)).

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

Sincerely,

for John C. Browner, Jr.
G. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/rbm

Attachments

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

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 42-222347
AC 42-222353

INTENT TO ISSUE

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

The applicant, Mark III Industries, applied on December 1, 1992, to the Department of Environmental Regulation for permits to modify the existing Ultraviolet Reactor Room and Paint Spray Booth operations. The proposed projects will occur at the applicant's existing facility located in Ocala, Marion County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 version). The project is not exempt from permitting procedures. The Department has determined that air construction permits are required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permits. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

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

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

The Petition shall contain the following information;

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

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

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

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

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

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

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

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a

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

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for John e Brown, Jr
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

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

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 _____.

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

Clerk

Date

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

AC 42-222347: Ultraviolet Reactor Room Operations
AC 42-222353: Paint Spray Booth Operations

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

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

The Petition shall contain the following information:

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

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

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

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

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

Department of Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

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

Technical Evaluation
and
Preliminary Determination

Mark III Industries
Marion County
Ocala, Florida

Construction Permit Nos.
AC 42-222347
AC 42-222353

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

December 2, 1992

I. Application

A. Applicant

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

B. Project

The applicant intends to modify the existing Ultraviolet Reactor Room (UVR) and Paint Spray Booth (PSB) operations. In the UVR operations, the federally enforceable VOC (volatile organic compounds/organic solvents) hourly limitation will be deleted and a quarterly operation report will be imposed due to the facility becoming synthetic minor (i.e., 249.0 TPY VOC). For the PSB operations, the allowable VOC emissions will be increased from 100.0 TPY to 124.0 TPY. The proposed modifications will take place at the applicant's existing facility in Marion County.

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

C. Process and Controls

1. UVR Operations

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

There are no outside controls associated with the UVR operations.

2. PSB Operations

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

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

There are no outside controls associated with the PSB operations.

D. Source Classification Codes (SCC)

The SCC for this operation are:

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

II. Rule Applicability

The project is subject to preconstruction review pursuant to Chapter 403, Florida Statutes; Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 version).

The application packages were deemed complete on December 1, 1992.

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

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

The UVR operations are permitted for a total of 125.0 TPY VOCs. The PSB operations are increasing from 100.0 TPY to 124.0 TPY VOCs. Due to this, the facility will become synthetic minor (i.e., 249.0 TPY VOCs).

Since the modifications, as a total, would be a minor modification to a major facility, the VOC emissions are subject to review in accordance with F.A.C. Rule 17-212.300, Sources Not Subject to Prevention of Significant Deterioration (PSD) or Nonattainment Requirements.

There are no specific source emission limiting standards pursuant to F.A.C. Rules 17-296 or 17-296.800. Therefore, the UVR and PSB operations are subject to emission limiting standards pursuant to F.A.C. Rules 17-296.310(2), General Visible Emissions Standard, and F.A.C. Rule 17-296.320(1) and (2), General Pollutant Emission Limiting Standards.

The UVRR and PSB operations are subject to F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

A material balance scheme will continue to be employed to account for the VOC emissions from the UVRR and PSB operations. Due to a synthetic minor facility designation (i.e., 249.0 TPY VOCs), a quarterly operation report shall be submitted to the Department's Southwest District by the 10th of the month following the last quarter of operations accounting for the VOC emissions from the UVRR and PSB operations; and, the report shall be accountable on a monthly basis. The quarters shall be January - March; April - June; July - September; and, October - December.

Initial and annual compliance tests for visible emissions shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-297.401(9). The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-297.340(1)(i). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-297.570(2).

III. Summary of Emission Limitations and Air Quality Analysis

A. Emission Limitations

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

Table 1

<u>Source</u>	<u>Pollutant</u>	<u>Maximum Allowable Emission Limitation</u>
UVRR Operations	VOCs	125.0 TPY (total)
	VE	less than 20% opacity
PSB Operations	VOCs	124.0 TPY (total)
	VE	less than 20% opacity

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

B. Air Quality Analysis

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

IV. Conclusion

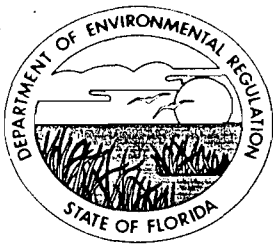
The emission limiting standards are in compliance with all applicable provisions of F.A.C. Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 vesion). The proposed permits (attached) will assure compliance with all requirements of these regulations.

Based on the information provided by Mark III Industries, the Department has reasonable assurance that the proposed modification to the UVRP and PSB operations, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 17-2 and 17-210 thru 297 of the Florida Administrative Code.

Preston Lewis
41755



A circular professional seal for Preston Lewis, a Registered Engineer in the State of Florida. The seal contains the text: PRESTON LEWIS, CERTIFICATE NO. 41755, STATE OF FLORIDA, REGISTERED ENGINEER. The seal is stamped in black ink.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994
County: Marion
Latitude/Longitude: 29°11'00"N
82°15'24"W

Project: Ultraviolet Reactor Room
Operations Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4; F.A.C. Chapters 17-210, 17-212, 17-272, 17-275, 17-296, and 17-297; and, 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For a modification to the existing Ultraviolet Reactor Room (UVR) operations, to delete the federally enforceable VOC (volatile organic compounds/organic solvents) hourly limitation and to impose a quarterly operation report requirement because of the synthetic minor facility qualifications (i.e., 249.0 TPY VOC).

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and processing fee received December 1, 1992.
2. Technical Evaluation and Preliminary Determination dated December 2, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Ultraviolet Reactor Room (UVR) operations shall not exceed 125.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-296.310(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-297.401(9) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-296.320(2).
6. The UVR operations are subject to the provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The UVR operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-297.340(1)(i). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-297.570(2).
9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
 - a. Initial inventory of all VOCs;
 - b. Deliveries of all VOC material after the initial inventory;
 - c. Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222347
Expiration Date: Dec. 31, 1994

SPECIFIC CONDITIONS:

- d. Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

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

10. Due to a synthetic minor facility designation (i.e., 249.0 TPY VOC), a quarterly operation report shall be submitted to the Department's Southwest District office by the 10th of the month following the last quarter of operations accounting for the VOC emissions from the UVRP operations; and, the report shall be accountable on a monthly basis. The quarters shall be January - March; April - June; July - September; and, October - December.

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

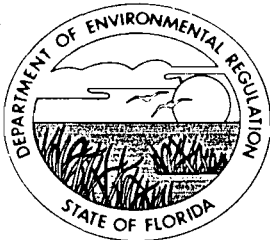
12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

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

Issued this _____ day
of _____, 1992

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Howard L. Rhodes
Director
Division of Air Resources
Management



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994
County: Marion
Latitude/Longitude: 29°11'00"N
82°15'24"W

Project: Paint Spray Booth
Operations Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4; F.A.C. Chapters 17-210, 17-212, 17-272, 17-275, 17-296, and 17-297; and, 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For a modification to the existing Paint Spray Booth (PSB) operations, which will allow an increase in the allowable VOC (volatile organic compounds/organic solvents) emissions from 100 TPY to 124 TPY. The facility will become a synthetic minor facility (i.e., 249.0 TPY VOC).

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), and processing fee received December 1, 1992.
2. Technical Evaluation and Preliminary Determination dated December 2, 1992.

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 24 hrs/day, 7 days/wk, and 52 wks/yr, for a total of 8,760 hrs/yr).
2. The total allowable volatile organic compounds/organic solvents (VOCs) emissions from the Paint Spray Booth (PSB) operations shall not exceed 124.0 TPY.
3. Visible emissions (VE) shall be less than 20% opacity pursuant to F.A.C. Rule 17-296.310(2).
4. Initial and annual VE compliance tests shall be conducted using EPA Reference Method 9 in accordance with F.A.C. Rule 17-297.401(9) and 40 CFR 60, Appendix A (July, 1991 version).
5. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-296.320(2).
6. The PSB operations are subject to the provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; and, 17-4.130: Plant Operations-Problems.
7. The PSB operations are subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4; F.A.C. Chapters 17-210 thru 297; and, 40 CFR (July, 1991 version).
8. The Department's Southwest District office shall be notified in writing at least 15 days prior to conducting compliance tests in accordance with F.A.C. Rule 17-297.340(1)(i). The test reports shall be submitted to the Department's Southwest District office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-297.570(2).
9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:
 - a. Initial inventory of all VOCs;
 - b. Deliveries of all VOC material after the initial inventory;
 - c. Quantification of VOCs recycled or collected and shipped to an approved waste facility after the initial inventory;

PERMITTEE:
Mark III Industries

Permit Number: AC 42-222353
Expiration Date: Dec. 31, 1994

SPECIFIC CONDITIONS:

- d. Ending inventory of all VOCs (12 calendar months after the initial inventory); and,
- e. Emissions must be verifiable on a monthly basis.

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

10. Due to a synthetic minor facility designation (i.e., 249.0 TPY VOC), a quarterly operation report shall be submitted to the Department's Southwest District office by the 10th of the month following the last quarter of operations accounting for the VOC emissions from the PSB operations; and, the report shall be accountable on a monthly basis. The quarters shall be January - March; April - June; July - September; and, October - December.

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

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

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

Issued this _____ day
of _____, 1992

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Howard L. Rhodes
Director
Division of Air Resources
Management



MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Services

Suite 104
8130 Baymeadows Way West
Jacksonville, Florida 32256

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

November 18, 1992

RECEIVED

NOV 20 1992

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

Division of Air
Resources Management

**SUBJECT: Revision to Construction Permit
Permit No. AC 42-176008
M&A Project No. JE1-820, Control No. 1953**

Dear Mr. Fancy:

Mark III is currently fine tuning their processes in response to continued growth, identifying and implementing various techniques to minimize VOC emissions and ensuring continued compliance with all regulatory requirements. As a part of these efforts Missimer & Associates, on behalf of Mark III Industries, is requesting that the hourly emission limit in Specific Condition No. 2 be deleted. A check for \$50.00 is enclosed in accordance with 17-4.050(4)(o)4 FAC for processing the requested revision.

Mark III Industries is accountable for Ultraviolet Reactor Room Operations emissions based on a material balance system described in the current permit. A copy of the permit is attached for your convenience. The records provide for monthly accountability as well as monthly cumulative totals for the calendar year. The records are available for inspection at any time but are not appropriate for generating reliable hourly emissions estimates. We respectfully request that the hourly emission limit imposed by Specific Condition No. 2 be deleted.

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

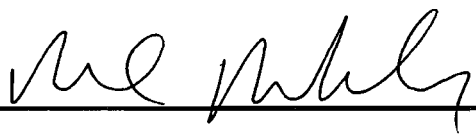
820.1953

Mr. Clair Fancy, P.E.
November 18, 1992
Page 2

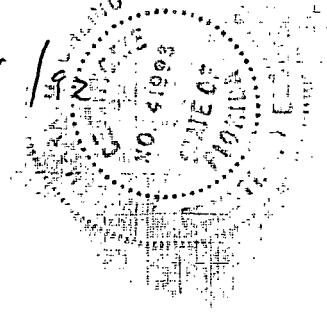
We would like to implement this revision as quickly as possible to avoid operational disruptions. For this reason we sincerely appreciate your assistance in expediting the review process. If you have any questions, please contact me or our consultant, Lloyd Stebbins, Missimer & Associates, Inc. at (904)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

Sincerely,

MISSIMER & ASSOCIATES, INC.



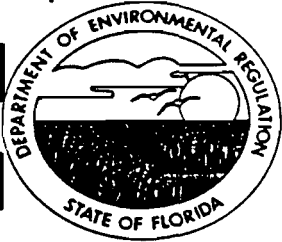
11/18/92



Mark Mechling, P.E.
Florida Licensed Professional
Engineer No. 41998

Date

MM/



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 42-176008

Expiration Date: Dec. 30, 1993

County: Marion

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

Project: Ultraviolet Reactor Room
Operations

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

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

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

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

PERMITTEE:
Mark III Industries

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

SPECIFIC CONDITIONS:

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

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

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

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

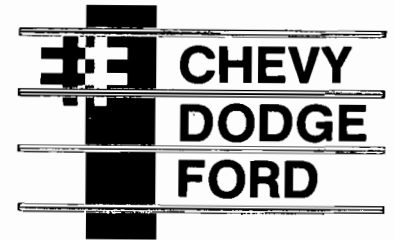
12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

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

Issued this _____ day
of _____, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, Director
Division of Air Resources
Management



November 18, 1992

RECEIVED

NOV 20 1992

Bureau of
Air Regulation

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

**SUBJECT: Modification to Construction Permit
Permit No. AC 42-176009
M&A Project No. JE1-820, Control No. 1953**

Dear Mr. Fancy:

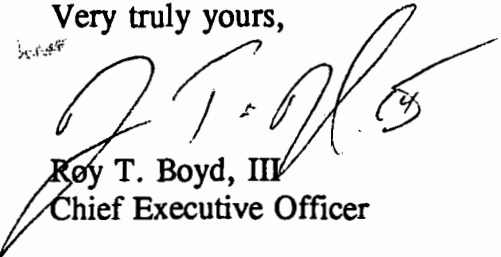
We are currently fine tuning our processes in response to our continuing growth, identifying and implementing various techniques to minimize VOC emissions and ensuring continued compliance with all regulatory requirements.

As part of our on-going efforts, we have directed our consultant to prepare the accompanying application to modify Specific Condition No. 2 of our current permit to better reflect operational conditions.

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

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

Very truly yours,



Roy T. Boyd, III
Chief Executive Officer

DATE	ACCOUNT	DESCRIPTION	AMOUNT
11/30/92	684000	PERMIT #AC42-176009	750.00

001031

.00 750.00



The #1 Van Conversion Company in the World

MARK III INDUSTRIES, INC.

P.O. BOX 2525
OCALA, FLORIDA 32678
(904) 732-5878

1007809

BARNETT-BANK OF MARION COUNTY, N.A.
OCALA, FLORIDA

DATE
11/30/92

PAY

****SEVEN HUNDRED FIFTY DOLLARS AND 00 CENTS

AMOUNT
*****750.00

TO THE ORDER OF

FL DEPT OF ENVIRONMENTAL REG.

J. Perkins

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

FEDERAL EXPRESS

FOR USE BY POWERSHIP CUSTOMERS ONLY

9377483342

23127

Sender's Account Number
1046-8572-2

9377483342

9377483342

CUSTOMER PACKAGE TRACKING NUMBER - PULL UP PURPLE TAB

From CONTROL #9-46900-14-Ship Date 11/30/92

To (If Hold for Pickup, Print FEDEX Address Here) (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.)
MR. BRUCE MITCHELL
FL. DEPT. OF ENVIRONMENTAL REG.
2600 BLAIRSTONE RD.
TALLAHASSEE FL 34482 Phone No. 32399-2400

Reference Info DAVID GABOARDI

Routing Code **MTI H**

PL SVC CODE

Priority Overnight Service
Standard Overnight Service
Econ. Two-Day
Gov't Overnight Svc.

WEIGHT DECLARED VALUE

SPECIAL HANDLING CODES

1 HOLD DELIVER FOR PICKUP DAY
2 DELIVER SATURDAY
3 DELIVER SUNDAY
4 DANGEROUS GOODS

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1992 DEC -1 AM 11:03

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NOV 20 1992

Division of Air
Resources Management

**APPLICATION FOR
MODIFICATION OF AIR POLLUTION PERMIT
PAINT SPRAY BOOTH OPERATIONS
No. AC42-176009**

**MARK III INDUSTRIES
OCALA, FLORIDA**

M&A Project No. JE1-820
Control No. 1953

Prepared for:

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

November 18, 1992

Mark Mechling, P. E.
Florida Licensed Professional
Engineer No. 41998


Signature 11/18/92
Date

Prepared by:

Missimer & Associates, Inc.
Environmental and Groundwater Services
Jacksonville, Florida
904/448-6400

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PAINT SPRAY BOOTH OPERATIONS
MARK III INDUSTRIES

Professional Engineer's Letter

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Attachment 3 Section V, 1, Supplemental Requirements

Attachment 4 Section V, 2, Supplemental Requirements

Attachment 5 Section V, 3, Supplemental Requirements

Attachment 6 Section V, 4, Supplemental Requirements

Attachment 7 Section V, 5, Supplemental Requirements

Attachment 8 Section V, 6, Supplemental Requirements

Attachment 9 Section V, 7, Supplemental Requirements

Attachment 10 Section V, 8, Supplemental Requirements

Attachment 11 Section V, 9, Supplemental Requirements



MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Services

Suite 104
8130 Baymeadows Way West
Jacksonville, Florida 32256

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

November 18, 1992

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

**SUBJECT: Modification to Construction Permit
Permit No. AC 42-176009
M&A Project No. JE1-820, Control No. 1953**

Dear Mr. Fancy:

The enclosed application package has been prepared for the paint spray booths at Mark III Industries customized van assembly plant in Ocala Florida. It is intended to modify Specific Condition No.2 of construction permit No. AC 42-176009. A check for \$250 is enclosed in accordance with 17-4.050(4)(a) FAC for processing the application.

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

As a part of our ongoing efforts we are now fine tuning the processes and in turn find it necessary to modify the existing permit to reflect actual operating conditions.

To reflect continued growth, we respectfully request that the 100 TPY limit imposed by Specific Condition No.2 be amended to 124 TPY. We also request that the hourly emission limit be deleted. Mark III Industries is already accountable for paint spray booth emissions based on the material balance system described in the existing permit. The records provide for monthly accountability as well as a monthly cumulative total for the calendar year. The records are available for inspection at anytime but are not appropriate for generating a reliable hourly emission estimate.

820.1953

Mr. Clair Fancy, P.E.
November 18, 1992
Page 2

If you have any questions or comments please call me at (904) 448-6400.

Sincerely,

MISSIMER & ASSOCIATES, INC.

A handwritten signature in cursive script, appearing to read "Mark Mechling".

Mark Mechling
Vice President/Regional Manager

MRR/

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

1990

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

1991

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

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

AC 42-222353

12-1-92 \$1000.00

R# 180818: \$25000

R# 180820: \$7500

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Paint Spray Booths [] New¹ [X] Existing¹

APPLICATION TYPE: [] Construction [] Operation [X] Modification

COMPANY NAME: Mark III Industries COUNTY: Marion

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

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

UTM: East 384.00 North 3235.54

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

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

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

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

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

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

*Attach letter of authorization

N/A

Signed: [Signature]

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

Date: 11-19-92 Telephone No. (904) 732-5878

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

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

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

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

Signed *Mark Mechling*

Mark Mechling
Name (Please Type)

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

8130 Baymeadows Way West, Suite 104 Jax., FL
Mailing Address (Please Type) 32256

Florida Registration No. 41998 Date: 11/18/92 Telephone No. (904) 448-6400

SECTION II: GENERAL PROJECT INFORMATION

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

Refer to Attachment I

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

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

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

N/A

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

AR42-154393, Expiration date: June 30, 1992

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

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

1. Is this source in a non-attainment area for a particular pollutant? No
a. If yes, has "offset" been applied? N/A
b. If yes, has "Lowest Achievable Emission Rate" been applied? N/A
c. If yes, list non-attainment pollutants. N/A

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No

a. If yes, for what pollutants? N/A

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

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

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Basemaker *	VOC	99.9	28.3	A&B in attachment 8

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

1. Total Process Input Rate (lbs/hr): 28.3 lbs/hr

2. Product Weight (lbs/hr): .03 lbs/hr

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

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
VOC	28.3	124	N/A	N/A	248,000	124	C, D, & E
SO2	0.00026	0.001	N/A	N/A			in attachment
NOx	0.027	0.12	N/A	N/A			8

¹See Section V, Item 2.

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

³Calculated from operating rate and applicable standard.

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

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

N/A

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

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
LP Gas	2.2 gal/hr **	2.93 gal/hr	0.2754 (mmBTU/hr)

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

* estimated
Fuel Analysis:

Percent Sulfur: approaches 0% Percent Ash: approaches 0%

Density: _____ lbs/gal Typical Percent Nitrogen approaches 0%

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

Other Fuel Contaminants (which may cause air pollution): N/A

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

Annual Average N/A Maximum _____

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

None

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

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

SECTION IV: INCINERATOR INFORMATION N/A

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

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer: _____

Date Constructed _____ Model No. _____

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

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

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

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

Brief description of operating characteristics of control devices: _____

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

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
refer to attachment 3
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
refer to attachment 4
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
refer to attachment 5
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
refer to attachment 6
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
refer to attachment 7
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
refer to attachment 8
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
refer to attachment 9
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
refer to attachment 10

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
refer to attachment 11
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit. N/A

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?
[] Yes [] No

Contaminant	Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)
[] Yes [] No

Contaminant	Rate or Concentration

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

Contaminant	Rate or Concentration

- D. Describe the existing control and treatment technology (if any).
- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

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

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

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

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

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

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

3.

- | | |
|-----------------------------|--------------------------|
| a. Control Device: | b. Operating Principles: |
| c. Efficiency: ¹ | d. Capital Cost: |
| e. Useful Life: | f. Operating Cost: |
| g. Energy: ² | h. Maintenance Cost: |

i. Availability of construction materials and process chemicals:

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

4.

- | | |
|-----------------------------|--------------------------|
| a. Control Device: | b. Operating Principles: |
| c. Efficiency: ¹ | d. Capital Costs: |
| e. Useful Life: | f. Operating Cost: |
| g. Energy: ² | h. Maintenance Cost: |

i. Availability of construction materials and process chemicals:

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

F. Describe the control technology selected:

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

¹Explain method of determining efficiency.

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

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

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

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

Other data recorded _____

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

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

B. Meteorological Data Used for Air Quality Modeling

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

C. Computer Models Used

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

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

D. Applicants Maximum Allowable Emission Data

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

E. Emission Data Used in Modeling

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

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1

Section II, A

Nature and Extent of Project

In the paint spray booth operations custom auto body parts are painted to match the color of vans received from the factory before final assembly. Parts are loaded onto a conveyor belt and pass under a photo cell which determines size. The size data is used to automatically control the reciprocating sprayers. The parts enter a spray booth where a base coat is applied by the automatic sprayers. After passing through a flash tunnel the parts enter a second spray booth, receive an additional coat and pass through another flash tunnel before entering the oven. The oven bakes the paint on the parts which are then ready for final assembly. Large drive in spray booths are used to perform this painting process manually on parts already assembled into vehicles.

Specific condition 2 of permit No. AC 42-176009 currently imposes a yearly VOC emission limit of 100 TPY and an hourly VOC emission limit of 22.8 lbs/hr on the Mark III Paint Spray Booth Operations. The intent of this application is to modify Specific Condition No. 2 to reflect actual operating conditions and ensure that Mark III industries remains in compliance with any and all permit requirements.

We request that the 100 TPY limit be increased to 124 TPY in anticipation of production increases. This increase brings the total facility wide VOC emissions to 249 TPY remaining below the 250 TPY PSD threshold.

Mark III demonstrates compliance with emission limits by material balance which conservatively assumes that the entire VOC content of the coating products is emitted. The data used to derive the material balance and therefor the emissions estimate is based on monthly accounting data. Because this material balance system cannot accurately demonstrate hourly emission rates we request deletion of the hourly emission limit stipulated in Specific Condition No. 2.

Attachment 2

Permit No. AC 42-176009



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

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

Permit Number: AC 42-176009

Expiration Date: Dec. 30, 1993

County: Marion

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

Project: Paint Spray Booth
Operations

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

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

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

The Standard Classification Codes are:

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

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

Attachments are listed below:

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

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

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

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

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

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

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

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

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

13. The permittee shall comply with the following:

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

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

c. Records of monitoring information shall include:

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

PERMITTEE:
Mark III Industries

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

GENERAL CONDITIONS:

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

SPECIFIC CONDITIONS:

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

PERMITTEE:
Mark III Industries

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

SPECIFIC CONDITIONS:

9. A material balance scheme shall be employed to account for VOC emissions and shall include the following:

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

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

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

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

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

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

Issued this _____ day
of _____, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, Director
Division of Air Resources
Management

Attachment 3

Section V, 1

Process Input Rate / Output Rate

Several materials which contain varying amounts of VOCs are used in the paint spray booth operation. Basemaker (BM) has the highest VOC content and serves as a surrogate for all emissions calculations related to this project.

Total process input rate (lbs/hr)
28.3 lbs BM/hr

Total process output rate (lbs/hr)
 $(28.3 \text{ lbs BM/hr}) - (28.3 \text{ lbs BM/hr})(99.9 \text{ wt\% VOC})$
 $= 0.03 \text{ lbs product/hr}$

Attachment 4

Section V, 2

Basis of Emission Estimates

Mark III demonstrates compliance with actual emission estimates based on a material balance using monthly accounting records. This method assumes all VOCs in the coating products is emitted.

Attachment 5

Section V, 3

Potential Emissions

The potential emissions in the case of this project are the same as the maximum emissions.

Attachment 6

Section V, 4

Air Pollution Control Systems

Mark III is currently bringing on-line several different VOC reduction technologies addressed in the current construction permit provided here as attachment 2.

Attachment 7

Section V, 5

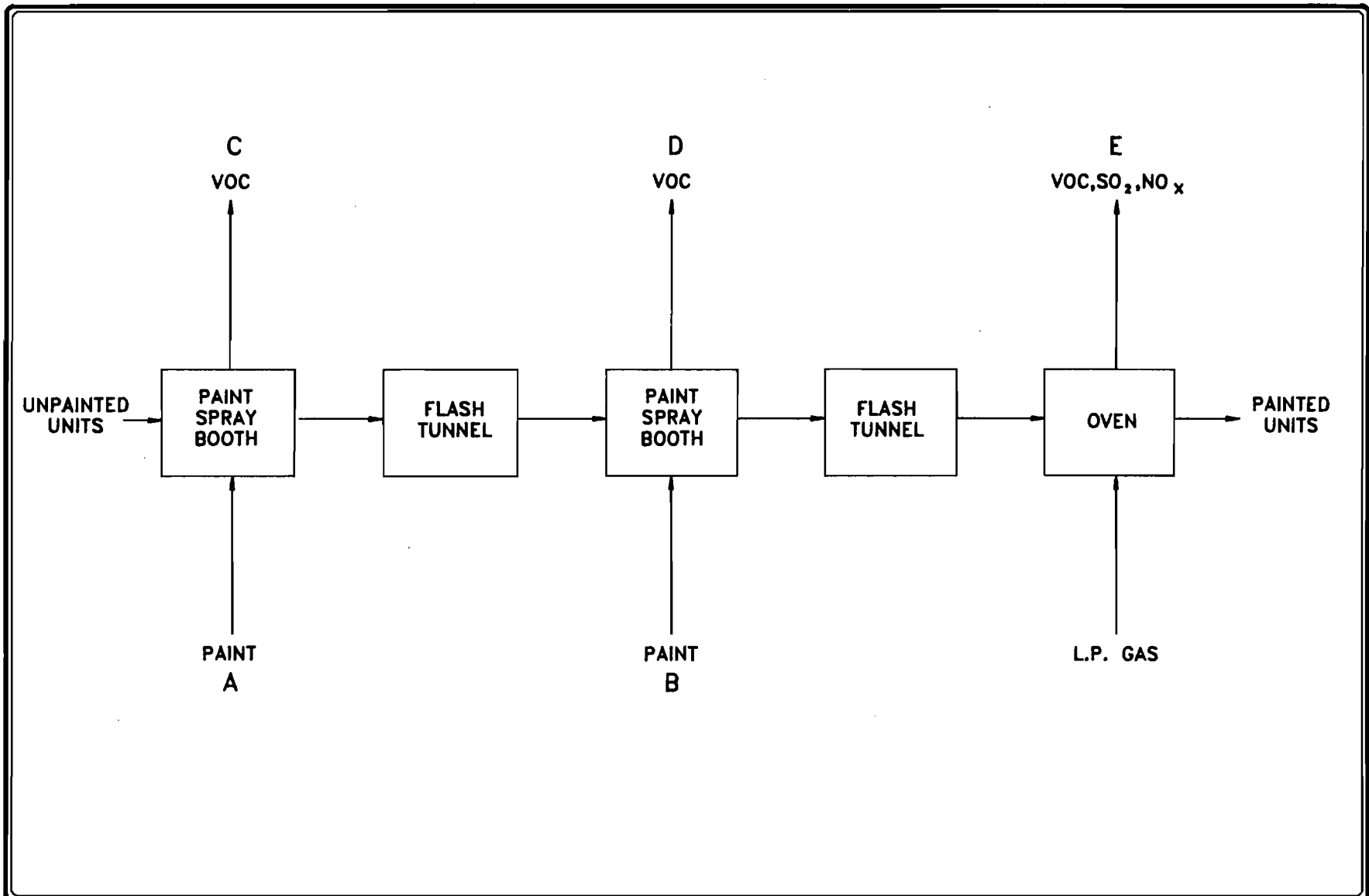
Control Device Efficiency

The paint spray booth operations do not currently use any conventional end of stack VOC control devices and therefor control efficiency does not apply. The paint spray booth operations rely on low solvent application technologies to control VOC emissions.

Attachment 8

Section V, 6

Process Flow Diagram



MSA	<i>ENVIRONMENTAL AND GROUNDWATER SERVICES</i>		Missimer & Associates, Inc.
	DRN. BY: CLP DWG NO. 92J0700	DATE: 11-17-92	
	PROJECT NAME: MARK III INDUSTRIES	PROJECT NUMBER: JE1-820	

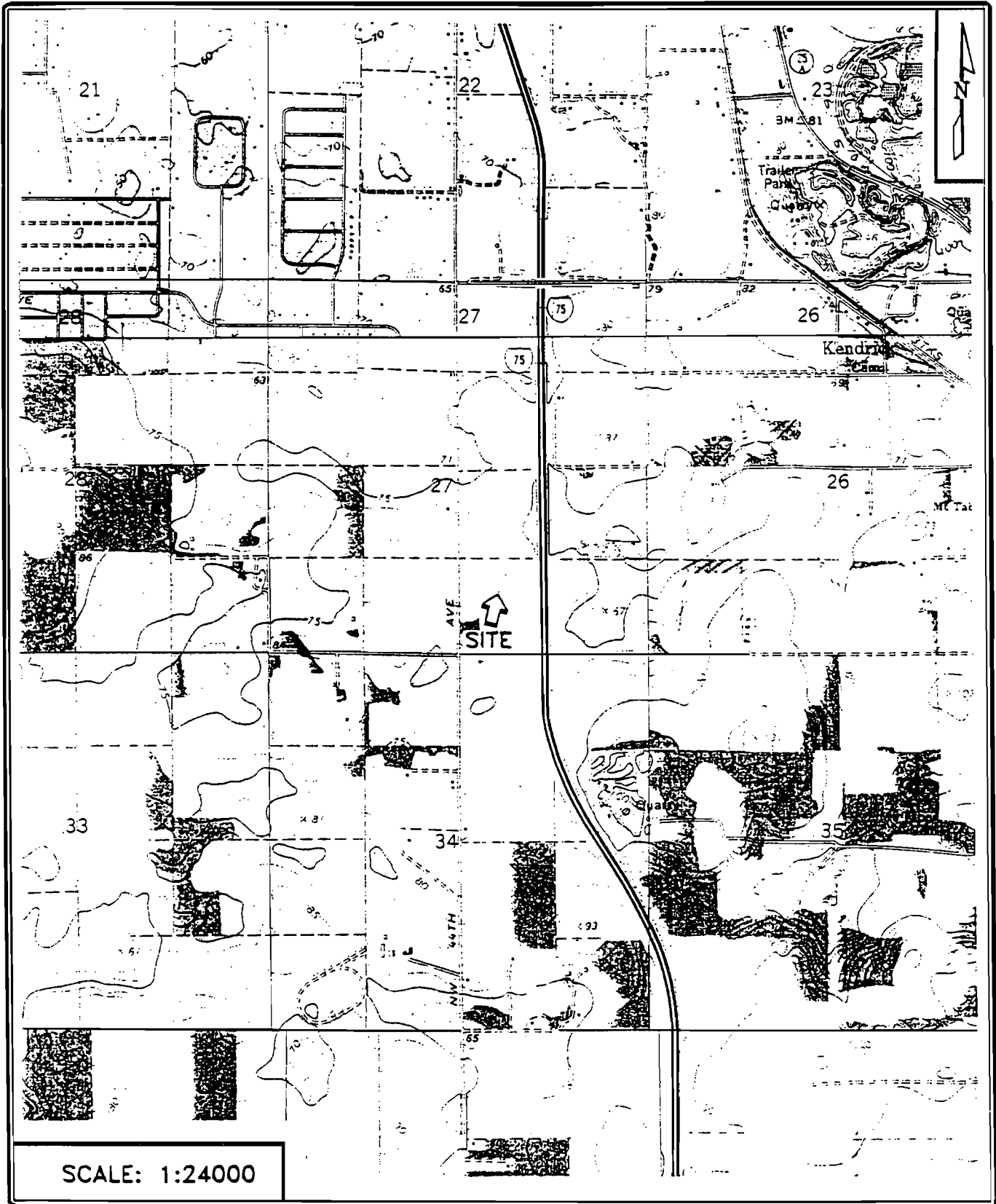
PROCESS FLOW DIAGRAM, PAINT SHOPS

Attachment 9

Section V, 7

Location Map

BEST AVAILABLE COPY



SCALE: 1:24000

M&A

ENVIRONMENTAL AND GROUNDWATER SERVICES

DRN. BY: CLP DWG NO. 91J1520

DATE: 3-23-92

PROJECT NAME: MARK III INDUSTRIES

NUMBER: JE1-448

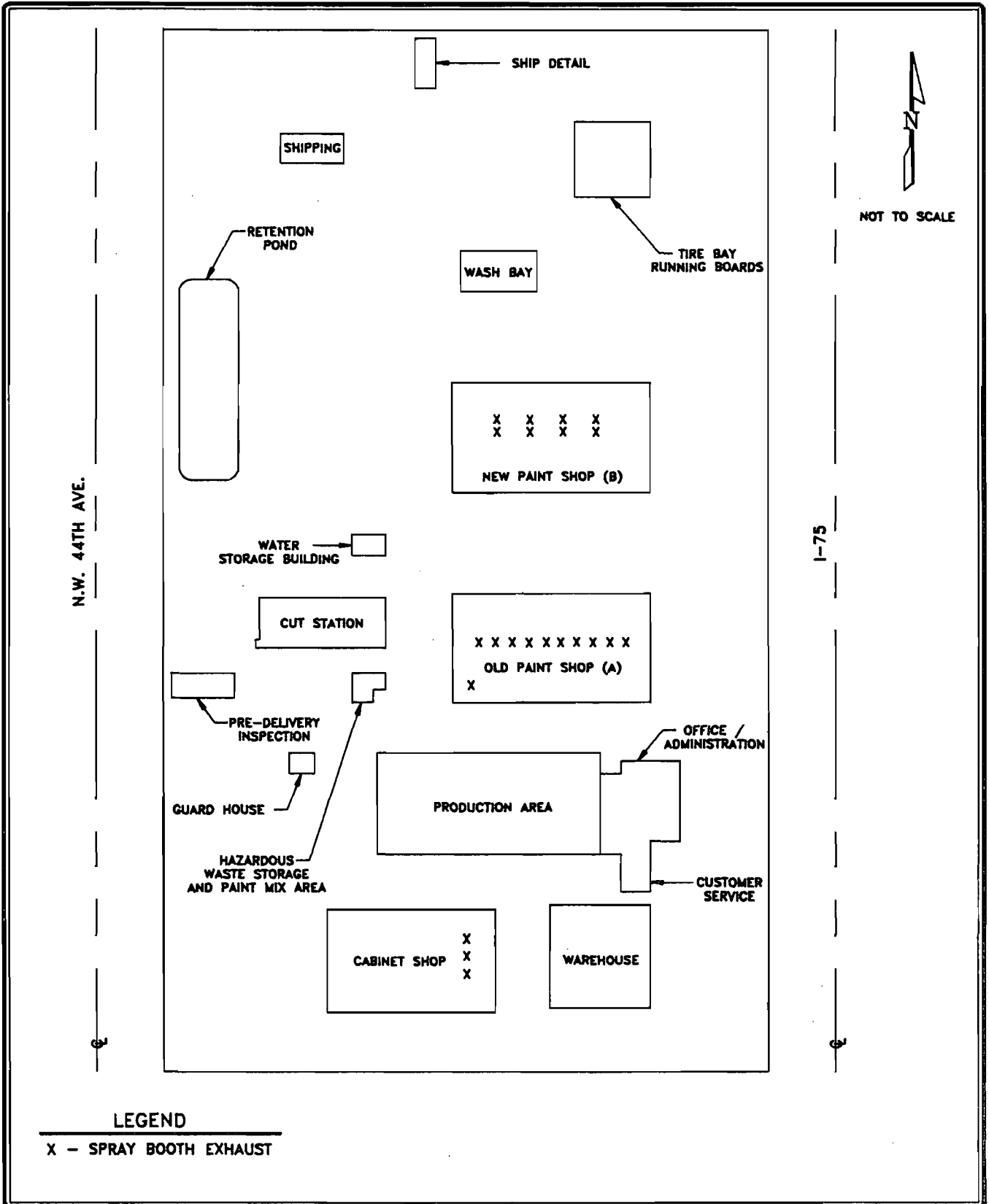
Missimer
&
Associates, Inc.

SITE LOCATION MAP MARK III INDUSTRIES, OCALA, FL
USGS OCALA WEST AND REDDICK, FL

Attachment 10

Section V, 8

Plot Plan



M&A	<i>ENVIRONMENTAL AND GROUNDWATER SERVICES</i>		Missimer & Associates, Inc.
	DRN. BY: CLP DWG NO. 92J0702	DATE: 11-18-92	
	PROJECT NAME: MARK III INDUSTRIES		

PLOT PLAN

Attachment 11

Section V, 9

Application Processing Fee