P 408 531 204

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Jerry C. Sibley	
Street and No. ~~FMC Corporation~~ Box 13400	
P.O., State and ZIP Code Orlando, FL 32859	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date Mailed: AC 48-121642	

PS Form 3800, Feb. 1982

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.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Mr. Jerry C. Sibley
FMC Corporation
Box 13400
Orlando, Florida 32859

4. Type of Service:
☐ Registered ☐ Insured
XX Certified ☐ COD
☐ Express Mail

Article Number
P 408 531 204

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery
7-16-87

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

DOMESTIC RETURN RECEIPT

File Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Jerry C. Sibley
FMC Corporation
Box 13400
Orlando, Florida 32859

July 10, 1987

Enclosed is construction permit No. AC 48-121642 to FMC Corporation for the modification of the existing facility by adding a paint drying booth and expanding production of fire trucks and airline ground support equipment. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit 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 permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

D. Dube
R. Simmons
T. Sawicki
J. Tessitore

file copy

Final Determination

FMC Corporation
Orlando, Orange County, Florida

Paint Spray Booths
Permit No. AC 48-121642

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

July 6, 1987

Final Determination

The application by FMC Corporation to modify a permit to construct a paint booth and a drying booth at their existing facility in Orlando, Orange County, Florida, has been reviewed by the Bureau of Air Quality Management. Public Notice of the Department's Intent to Issue the modified permit was published in The Orlando Sentinel on October 19, 1986.

The following comments were received from Tom Sawicki of DER's Central Florida District:

a) Specific Condition No. 3 (SC #3) should include reference to the rule requiring Reasonably Available Control Technology (RACT).

b) SC #9 should define the technical terms used in the condition.

c) SC #10 need not include the fourth paragraph addressing plant operations.

The Bureau is in agreement with these comments and will amend the permit accordingly.

Comments were also received from Kenneth Klass, Counsel for FMC, addressing the following issues (See Attachment 4):

1) FMC feels that Rule 17-2.650(1)(f)14.a(ii)(I), of the Florida Administrative Code (FAC), RACT exemption for customized topcoating of trucks (when production is less than 35 vehicles per day), exempts all the surface coatings used in the process rather than just the "topcoat."

2) FMC also feels that the paint spray operation at the Orlando facility should be viewed as a single coating line rather than each paint booth being a separate line.

Additional comments were also received from Russell Simmons and, Keith Shellkopf of FMC, requesting a longer averaging time than 24 hours for RACT compliance.

The Department does not agree with comments (1) and (2) and therefore, will not change those aspects of the proposed permit. However, a seven-day rolling average will be allowed to determine compliance with the RACT standard. For determining compliance with overall VOC emission limits:

a) A seven-day rolling average will be allowed to evaluate daily emissions.

b) A twelve-month rolling average will be allowed to evaluate monthly (30 day) emissions.

This provision takes into consideration the daily and seasonal fluctuations in the production levels (and therefore the emission levels) of FMC's Orlando facility.

The following changes will be made in the permit to reflect the Department's consideration of the comments received:

Changes in Specific Conditions:

No. 2

From:

Maximum annual allowable emissions shall not exceed 72 TPY (tons per year) for VOC (volatile organic compounds), and 7.2 TPY for PM (particulate matter). Maximum 30 day allowable emissions shall not exceed 6 tons for VOC and 0.6 tons for PM.

To:

Maximum annual allowable emissions shall not exceed 72 TPY (tons per year) for VOC (volatile organic compounds), and 7.2 TPY for PM (particulate matter). Maximum 30 day allowable emissions shall not exceed 7 tons for VOC and 0.7 tons for PM, based on a 12-month rolling average (12 MRA). Maximum daily (24-hr) allowable emissions shall not exceed 500 lbs for VOC based on a 7-day rolling average (7 DRA).

No. 3

From:

The VOC allowable emission limiting standard, not to be exceeded, is 3.5 pounds per gallon of coating (0.42 kilograms per liter), less water, delivered to a coating applicator, averaged per line, and on a daily basis.

To:

The VOC allowable emission limiting standard, not to be exceeded, is 3.5 pounds per gallon of coating (0.42 kilograms per liter), less water, delivered to a coating applicator, averaged per line (per booth), based on a 7 DRA. The 3.5 pounds VOC/gallon of coating standard is considered Reasonably Available Control Technology in accordance with Rule 17-2.650(1)(f)14, FAC, (Florida Administrative Code).

No. 9

From:

9. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor, off plant property, pursuant to Rule 17-2.620(2), FAC (Florida Administrative Code).

To:

9. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to Rule 17-2.620(2), FAC. Objectionable odor is defined as any odor present in the outdoor atmosphere which, by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to Rule 17-2.100, FAC. Odor is defined as a sensation resulting from stimulation of the human olfactory organ pursuant to Rule 17-2.100, FAC.

No. 10

From:

10. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit, (Rule 17-2, FAC).

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rules 17-2 and 17-4, FAC).

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

Upon obtaining an operating permit, the permittee will be required to submit annual test reports on the actual operation and emissions of the facility, such as paint analyses obtained by using EPA Method 24, paint vendors specifications to show concurrence with paint analyses performed, and the annual operating report which contains the quantified and qualified actual pollutant emissions from the facility.

To:

10. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit, (Rule 17-2, FAC).

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rules 17-2 and 17-4, FAC).

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

The final action of the Department will be to issue the modified permit as proposed in the Preliminary Determination with the above mentioned amendments.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

PERMITTEE:
FMC Corporation
Airline Equipment Division
7300 Presidents Drive
Orlando, Florida 32859

Permit Number: AC 48-121642
Expiration Date: June 30, 1988
County: Orange
Latitude/Longitude: 28° 27' 43"N/
81° 24' 39"W
Project: Four Paint Spray Booths

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

For the modification of the existing facility by adding a paint drying booth and expanding production of fire trucks and airline ground support equipment.

Construction shall be in accordance with the permit application and plans, documents and reference literature submitted unless otherwise stated in the General and Specific Conditions herein.

Attachments:

1. FMC's application package dated June 19, 1986.
2. DER's letter requesting additional information dated July 18, 1986.
3. FMC's response dated August 1, 1986.
4. FMC's letter dated December 5, 1986.
5. FMC's letter dated June 24, 1987.

PERMITTEE: FMC Corporation

Permit Number: AC 48-121642
Expiration Date: June 30, 1988

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. a description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

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

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

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

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

1. The facility may operate continuously.

2. Maximum annual allowable emissions shall not exceed 72 TPY (tons per year) for VOC (volatile organic compounds), and 7.2 TPY for PM (particulate matter). Maximum 30 day allowable emissions shall not exceed 7 tons for VOC and 0.7 tons for PM, based on a 12-month rolling average (12 MRA). Maximum daily (24-hr) allowable emissions shall not exceed 500 lbs for VOC based on a 7-day rolling average (7 DRA).

3. The VOC allowable emission limiting standard, not to be exceeded, is 3.5 pounds per gallon of coating (0.42 kilograms per liter), less water, delivered to a coating applicator, averaged

SPECIFIC CONDITIONS:

per line, (per booth), based on a 7 DRA. The 3.5 pounds VOC/gallon of coating standard is considered Reasonably Available Control Technology in accordance with Rule 17-2.650(1)(f)14, FAC, (Florida Administrative Code).

4. EPA Method 24 shall be required for each surface coating material to determine VOC content, water content, density, volume solids, and weight solids. The paint shall be tested as applied and testing should only be required again if the formula, as applied, changes.

5. The permittee shall maintain accurate record-keeping of the inventory of all paints and solvents used in operation of the 4 spray booths. The permittee shall submit annual reports to the Central Fla. District office as proof of compliance. A special note shall be made in the records to differentiate exempt from non-exempt coatings, with regards to RACT standards.

6. Compliance with the conditions of the permit shall be determined through visual inspection by a Department representative and submittal of paint/solvent records as stated in Condition No. 5. The permittee shall notify the Department 15 days prior to testing.

7. During those times when the facility is being used for spray painting of other related activities where solvent emissions can escape to the atmosphere, the doors shall be closed. Additional precautions, such as covering of solvent containers when not in use, shall be taken to prevent escape of VOC fugitive emissions.

8. The paint spray booth(s) shall not be operated unless the exhaust fan and abatement equipment are functioning properly.

9. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to Rule 17-2.620(2), FAC. Objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to Rule 17-2.100, FAC. Odor is defined as a sensation resulting from stimulation of the human olfactory organ pursuant to Rule 17-2.100, FAC.

10. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable

SPECIFIC CONDITIONS:

to complete construction on schedule, the Department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit, (Rule 17-2, FAC).

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the Department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rules 17-2 and 17-4, FAC).

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4, FAC)

11. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the Department's District office.

12. This permit shall replace previous permit(s) issued for FMC's paint booths.

PERMITTEE: FMC Corporation

Permit Number: AC 48-121642
Expiration Date: June 30, 1988

SPECIFIC CONDITIONS:

Issued this 9 day of July, 1987

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

DALE TWACHTMANN, Secretary

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ Loc/Ph: _____

To: _____ Loc/Ph: _____

To: _____ Loc/Ph: _____

From: _____ Date: _____

RECEIVED
JUL 8 1987
Office of the Secretary

TO: Dale Twachtmann

THRU: Howard Rhodes

FROM: Clair Fancy

DATE: July 6, 1987

SUBJ: Approval of Construction Permit No. AC 48-121642
FMC Corporation

Attached for your approval and signature is a construction permit for the modification of the existing facility by adding a paint drying booth and expanding production of fire trucks and airline ground support equipment. There have been comments regarding this permit.

Day 90 after which this permit will be issued by default is August 30, 1987 (waiver date).

The Bureau recommends approval and signature.

CHF/MJ/s

attachment

→ P5/25

Check Sheet

Company Name: FMC Corporation
Permit Number: AC 48-216042
PSD Number:
County:
Permit Engineer:
Others involved:

Application:
- [x] Initial Application
- [x] Incompleteness Letters
- [x] Responses
- [ ] Final Application (if applicable)
- [ ] Waiver of Department Action
- [ ] Department Response
- [ ] Other

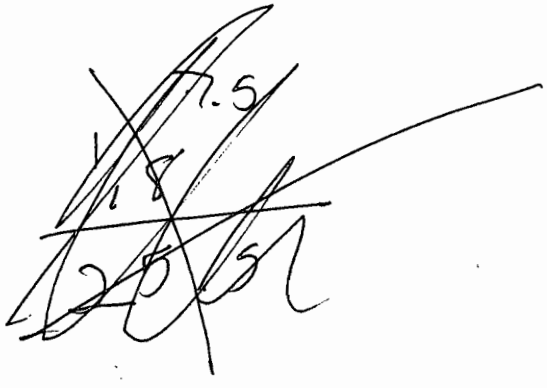
Intent:
- [x] Intent to Issue
- [x] Notice to Public
- [x] Technical Evaluation
- [ ] BACT Determination
- [x] Unsigned Permit
- [ ] Correspondence with:
  - [ ] EPA
  - [ ] Park Services
  - [ ] County
  - [x] Other
- [ ] Proof of Publication
- [ ] Petitions - (Related to extensions, hearings, etc.)
- [ ] Other -
- [x] Waiver

Final Determination:
- [x] Final Determination
- [x] Signed Permit
- [ ] BACT Determination
- [ ] Other

Post Permit Correspondence:
- [ ] Extensions
- [ ] Amendments/Modifications
- [ ] Response from EPA
- [ ] Response from County
- [ ] Response from Park Services
- [ ] Other

Per Patty,

This file was handled in the district She says to pull it aside and we will put it with the PSD files or BACT files. There is no need to image them



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

For Routing To Other Than The Addressee	
To:	Location:
To:	Location:
To:	Location:
From:	Date:

TO: FMC file, Permit No. AC 48-121642

THRU: Bill Thomas BT

FROM: Pradeep Raval PR

DATE: July 1, 1987

SUBJECT: VOC Emissions Averaging Period for Compliance Purposes.

The Bureau has decided that averaging periods exceeding 24-hours are in order pertaining to FMC's Fire Apparatus Facility and Airline Equipment Facility in Orlando, Florida.

Compliance with RACT standards will be allowed by way of a seven day rolling average (7 DRA).

Compliance with overall VOC emission limits will be allowed by:

1) 7 DRA for compliance with daily emissions limit.

2) 12 month rolling average for monthly emission limits.

PR/ss

PM
6-24-87
Orlando, FL

Express Mail:
B 67004992

File Copy

FMC Corporation

Airline Equipment Division
7300 Presidents Drive
Box 13400
Orlando Florida 32859
305 851 3377

FMC

June 24, 1987

Mr. Pradeep A. Raval
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Raval:

FMC personnel appreciate your efforts to resolve the remaining concerns prior to the Florida Department of Environmental Regulations' (DER) issuance of a modified permit for four (4) paint spray booths at the FMC Corporation facility at 7300 Presidents Drive, Orlando, Florida.

Based on our telephone conversation of June 17, 1987, FMC understands that DER will include a specific condition in the new permit which provides a "reasonable time" for FMC to:

1) Complete the evaluation of new RACT complaint primer coatings and implement the change-over for application vehicles and

2) Revise the data management/reporting system for scheduling and tracking paint usage on a booth by booth basis.

(The data management revisions include modification of computer hardware, development of computer software modifications and revisions to the data collection system.) The change-over to a new primer paint coating and the modification of the data management/reporting both require time for development, implementation and troubleshooting. We understand that the permit specific condition allow 6 months for the change over period, during which time FMC will be allowed to operate under the same conditions as the current permit.

DER

JUN 25 1987

BAQM

6·24·87

Bradley,

Here is the revised letter.
Please destroy the first letter
which was sent to you on 6/22/87.
I appreciate your help in this
matter.

Sincerely,
Peter S.

Bruce,
I have the other letter. PR

As we discussed, FMC is now evaluating new primer coatings from two manufacturers for use on fire apparatus. The coatings under evaluation are RACT compliant, i.e. contain 3.5 pounds or less VOC per gallon of coating as applied; are being evaluated as replacement for the presently used primer; and are being evaluated as coatings that will provide adequate bonding to metal surfaces without the use of high VOC wash primer coatings. The modification of the paint coating types must both achieve RACT compliance and maintain the quality and durability of the automotive type coatings applied to the fire engines.

Significant progress has been made in finding two suppliers of RACT compliant paints which have potential as replacement for existing primers. Those paints, now being evaluated, are: 1) a Gavlon two component epoxy primer (9815 HS activator and 5115 S reducer) and 2) a Deft two component epoxy primer (44-GY-7). Both paints have passed the preliminary production application characteristics evaluation and the "scratch" adhesion test. Those paints are now being evaluated in the paint laboratory for adhesion characteristics; that evaluation requires several weeks testing.

The evaluation of new coatings is in the preliminary stage. While present results are encouraging it is possible that different paint coating formulations or modifications of the metal preparation techniques, e.g. spray phosphatizing, may be required before coatings are obtained which meet both RACT and product quality requirements.

We request your assistance in expediting the review of the revised permit so it will be issued by mid-July. The FMC Orlando facility may need the new permit by mid-July due to increased production rates and the resulting increases in volume of paint coatings applied.

If there are any questions, or if additional information is needed, please phone Keith Schellkopf, 305/850-2865, or me, 305/850-2850.

Sincerely,

Larry E. McIntyre
Manufacturing Manager

cc: File
D. Dube
K. Klass

0674R Bill Thom, Chris Fancy } 6-25-87 WMH
Tom Sawicki 6-26-87 RAM

PM
4-22-87
Tallahassee FL

Express Mail

File Copy

LAW OFFICES

HOLLAND & KNIGHT

1401 Manatee Avenue West
P. O. Box 241
Bradenton, Florida 33506
(813) 747-5550

One East Broward Blvd.
P. O. Box 14070
Fort Lauderdale, Florida 33302
(305) 525-1000

92 Lake Wire Drive
P. O. Drawer B W
Lakeland, Florida 33802
(813) 682-1161

1200 Brickell Avenue
P. O. Box 015441
Miami, Florida 33101
(305) 374-8500

255 South Orange Avenue
P. O. Box 1526
Orlando, Florida 32802
(305) 425-8500

Barnett Bank Bldg.
P. O. Drawer 810
Tallahassee, Florida 32302
(904) 224-7000

600 North Florida Ave.
P. O. Box 1288
Tampa, Florida 33601
(813) 223-1621

Cable Address
Hnd Knight Tpa
H&K Mia
Telex 5-2630-Tampa
Telex 52-2233-Miami

Please Reply To: Tallahassee

888 Seventeenth Street, N. W.
Suite 400
Washington, D. C. 20006
(202) 955-5550

April 22, 1987

Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: FMC Corporation-DER Permit No. AC48-121642
(Our File 18983-6)

Dear Bill:

Please find enclosed an original executed waiver of the ninety-day time limit under Section 120.60(2), Florida Statutes, concerning the matter referenced above. The waiver expires as of August 30, 1987.

Sincerely,

HOLLAND & KNIGHT

Robert L. Rhodes, Jr.

RLRjr/cs
Attachment
cc: Julia Costas, Esquire
Kenneth N. Klass, Esquire
18983-6L4/22:87

DER
APR 23 1987
BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

Permit No. AC48-121642
Applicant's Name: FMC Corporation
OGC File No. 86-1410

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced matter, the Applicant hereby with full knowledge and understanding of its right under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Satutes, to have the application approved or denied by the State of Florida Deparment of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in its self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 30th day of August, 1987.

The undersigned is authorized to make this waiver on behalf of the applicant.

Robert L. Rhodes, Jr., of
HOLLAND & KNIGHT
Attorneys for Petitioner
FMC Corporation

4/22/87
Date

Sworn to and subscribed
before me this 22nd day
of April, 1987

Connie H. Stevens
Notary Public

My Commission Expires:

Notary Public, State of Florida
My Commission Expires Aug. 20, 1989
Bonded Thru Troy Fain-Insurance Inc.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

March 4, 1987

Kenneth N. Klass
Counsel
FMC Corporation
2000 Market Street
Philadelphia, PA 19103

DER
MAR 4 1987
BAQM

Re: FMC Corporation - DER Permit No. AC 48-122642

Dear Mr. Klass:

I have forwarded your letter of February 26, 1987 to Mark Zilberberg, a senior attorney in this office who has, at my request, assumed responsibility for providing legal assistance to the Bureau of Air Quality Management on this particular construction permit application. While normally I am the attorney who advises the Bureau on permitting matters, Mark Zilberberg is responsible for VOC-RACT issues, and has agreed to provide assistance for this permit application.

I will continue to monitor developments in this matter, and am of course available to provide assistance if necessary.

Sincerely,

Julia Cobb Costas
Assistant General Counsel

cc: Mark Zilberberg, Esquire
Bill Thomas, BAQM

JCC:ks

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) Bill Thomas, BAQM	Initial	
	Date	
2. Raval	Initial	
	Date	
3.	Initial	
	Date	
4.	Initial	
	Date	

REMARKS:

DER
MAR 4 1987
BAQM

INFORMATION

- [ ] Review & Return
- [ ] Review & File
- [ ] Initial & Forward
- [ ]

DISPOSITION

- [ ] Review & Respond
- [ ] Prepare Response
- [ ] For My Signature
- [ ] For Your Signature
- [ ] Let's Discuss
- [ ] Set Up Meeting
- [ ] Investigate & Report
- [ ] Initial & Forward
- [ ] Distribute
- [ ] Concurrence
- [ ] For Processing
- [ ] Initial & Return

FROM: Julie Costas

DATE 3-4-87

PHONE 89730

FMC Corporation

2000 Market Street
Philadelphia Pennsylvania 19103
215 299 6000

February 26, 1987

Julia Costas, Esquire
Office of General Counsel
State of Florida
Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32301

Re: FMC Corporation - DER Permit No. AC 48-122642
Orlando, Florida

Dear Ms. Costas:

On December 5, 1986, I wrote you on behalf of FMC Corporation ("FMC"), regarding the Department of Environmental Regulation's ("DER") proposed issuance of the above-referenced permit. As explained in that letter, various provisions of the draft permit would impose severe, adverse and unnecessary operating constraints on FMC's Orlando, Florida production facilities. With the hope that these issues can be resolved amicably through informal discussions with DER, FMC has been engaged in discussions with the permit writer assigned to this permit. We understand that the input of the DER Office of General Counsel will be necessary in order to move things towards a successful conclusion, but this matter has now been assigned to another attorney in your office.

Although FMC is currently operating under a valid, DER-issued permit, increased production needs make it imperative that a new permit be expeditiously issued to enable FMC to meet its customer demands while remaining in compliance with its permit. The situation will, within the next couple of months, reach a critical stage wherein FMC's ability to continue production may be seriously impaired. Because I do not know who the attorney now assigned to this matter is, I

am writing to you in the hope that you will communicate to this person the need to participate in the resolution of this matter as quickly as possible.

Thanking you in advance for your assistance in this matter, I remain,

Very truly yours,

Kenneth N. Klass
Counsel

1505D30004DTcjz

PM
1-16-87
Tally, FL

LAW OFFICES

HOLLAND & KNIGHT

1401 MANATEE AVENUE WEST
P. O. BOX 241
BRADENTON, FLORIDA 33506
(813) 747-5550

ONE EAST BROWARD BLVD.
P. O. BOX 14070
FORT LAUDERDALE, FLORIDA 33302
(305) 525-1000

92 LAKE WIRE DRIVE
P. O. DRAWER B W
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(813) 682-1161

1200 BRICKELL AVENUE
P. O. BOX 015441
MIAMI, FLORIDA 33101
(305) 374-8500

255 SOUTH ORANGE AVENUE
P. O. BOX 1526
ORLANDO, FLORIDA 32802
(305) 425-8500

BARNETT BANK BLDG.
P. O. DRAWER 810
TALLAHASSEE, FLORIDA 32302
(904) 224-7000

600 NORTH FLORIDA AVE.
P. O. BOX 1288
TAMPA, FLORIDA 33601
(813) 223-1621

CABLE ADDRESS
HND KNIGHT TPA
H&K MIA
TELEX 5-2630-TAMPA
TELEX 52-2233-MIAMI

888 SEVENTEENTH STREET, N. W.
SUITE 400
WASHINGTON, D. C. 20006
(202) 955-5550

PLEASE REPLY TO: Tallahassee

January 16, 1987

DER
JAN 20 1987
BAQM

Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florid 32399-2400

Re: FMC Corporation-DER Permit No. AC48-122642
(Our File 18983-6)

Dear Bill:

Please find enclosed an original executed waiver of the ninety-day time limit under Section 120.60(2), Florida Statutes, concerning the matter referenced above. The waiver expires as of May 1, 1987.

Sincerely,

HOLLAND & KNIGHT

Robert L. Rhodes, Jr.

RLRjr/cs
Attachment
cc: Julia Costas, Esquire
Kenneth N. Klass, Esquire
18983-6L1/16:87

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

Permit No. AC48-121642
Applicant's Name: FMC Corporation
OGC File No. 86-1410

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced matter, the Applicant hereby with full knowledge and understanding of its right under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Satutes, to have the application approved or denied by the State of Florida Deparment of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in its self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 1st day of May, 1987.

The undersigned is authorized to make this waiver on behalf of the applicant.

Robert L. Rhodes, Jr., of
HOLLAND & KNIGHT
Attorneys for Petitioner
FMC Corporation

1/16/87
Date

Sworn to and subscribed
before me this 16th day
of January, 1987

Connie M. Stevens
Notary Public
My Commission Expires:

Notary Public, State of Florida
My Commission Expires Aug. 28, 1989
Bonded Thru Troy Fain-Insurance Inc.

File Copy
Bill Thomas

DER

DEC 8 1986

BAQM FMC

December 5, 1986

Julia Costas, Esquire
Office of General Counsel
State of Florida
Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32301

1

RE: FMC Corporation - DER Permit No. AC 48-12[illegible]642
Orlando, Florida

Dear Ms. Costas:

I am writing to you at the suggestion of Mr. Bill Thomas regarding the Department of Environmental Regulation's ("DER") proposed issuance of the above-referenced permit to FMC Corporation ("FMC"). As you may know, FMC has serious problems with the proposed permit which it would like to resolve with DER without the necessity of initiating formal adjudicatory proceedings.

To facilitate discussions with DER, FMC filed a waiver of the 90 day time limit under Section 120.60(2), Florida Statutes and sought and received an extension of the time within which it must file a petition for an administrative hearing in connection with the subject permit. We particularly appreciate DER's cooperation in securing this extension and its willingness to participate in informal negotiations.

Rather than attempting to detail the discussions with DER leading up to FMC's application for this permit, I would like to focus here upon the two issues of greatest concern to FMC.

1. RACT Compliance for Non-Exempt Coatings

FMC's surface coating operations (airline ground support equipment and fire trucks) fall under the Miscellaneous Metal Parts and Products category and are, therefore, subject to the requirements of FAC Rule 17-2.650 (1)(f)(14). In its permit application, FMC requested that volatile organic compound ("VOC") emissions from nonexempt coatings be averaged on a per line basis,

across all painting and drying booths used in the line. This method of averaging is simply a continuation of the method allowed by the permit under which FMC is now operating. While Specific Condition 3 of the proposed permit also appears to allow this, Section IV of the October 2, 1986 DER document titled "Technical Evaluation and Preliminary Determination," states that averaging will take place "on a per line (per booth) basis," thereby treating each booth as a separate line.

Assuming that this quoted statement represents DER's interpretation of Specific Condition 3, FMC must take issue with it. Each booth does not, in fact, represent a separate coating line. FMC operates a single coating line in which the four painting/drying booths are used interchangeably for the application of the many different coatings required by FMC's customers in the production of customized wheeled vehicles. All coatings, be they primer or top coat, are applied in any of the spray booths on an as needed, as available basis. Since painting requirements fluctuate from day to day and booth to booth, it is essential for FMC to utilize all booths efficiently. This necessitates the ability to apply the different coatings in each booth as the need arises.

Characterizing this operation as one involving four separate lines is not only inaccurate when applied to FMC's operation, it renders almost impossible FMC's ability to meet Florida's surface coating regulations while adhering to customer requirements. FMC annually applies over 120 different colors of top coat paint as well as several types of primers and protective coatings and must use the types of paints which meet the quality and durability requirements of its customers. As you might expect, given this great variety of coatings, FMC has been unable to obtain each color in a formulation meeting the 3.5 lbs. of VOC per gallon requirement. The practical problem created by the booth-by-booth approach is readily illustrated by the painting of a single large vehicle. Painting such a vehicle will often take almost the entire work day. Thus, when a paint with a VOC content in excess of 3.5 lbs. must be used, the booth in which the painting is done, if viewed in isolation from the others, will be unable to comply with the proposed permit limitation. Nonetheless, when paint usage from all booths is averaged over a day, the 3.5 lbs/VOC per gallon requirement can be achieved by scheduling painting operations so paints with lower VOC content are used in some booths to offset use of higher VOC paint in other booths.

The problems created by the need to use so many different coatings are not unique to FMC. The peculiarities of FMC's product line are analagous to those experienced by the can coating industry. In response to the problems faced by can coaters, the State of Florida and the U.S. Environmental Protection Agency have permitted them to average emissions not only across booths, but across lines as well. See FAC Rule 17-2.160(1)(f)(1). The reasons given for allowing this approach, as set forth in the EPA policy memorandum incorporated by reference into Florida's can coating rules are:

> "...the severe practical problems faced by can manufacturing plants where a number of lines apply as many as 50 different coatings, depending on the end uses of the cans. In this industry, line specific emission limitations may cause coaters to be in violation when a high solvent coating is applied." (45 FR 80824)

As described above, the problems faced by FMC at its Orlando, Florida facility are no less severe than those faced by can coaters. Indeed, the problem is greater given that FMC uses well over twice as many different coatings than are used by can coaters. Moreover, it is instructive to note that can coaters are permitted to average not only across lines, but across entire plants as well. (See 45 FR 80824) While FMC does not request that DER go to such an extreme in this case, it does ask for the same consideration shown to the can coating industry under remarkably similar circumstances.

2. RACT Exemption for Fire Truck Coating

DER's October 2, 1986 Technical Evaluation and Preliminary Determination document states that top coats used on fire trucks are "exempt from RACT standards since the production will be less than 35 vehicles per day, in accordance with Rule 17-2.650(1)(f)14.a(ii)I, FAC." FMC concurs with this statement, as far as it goes. FMC believes, however, that this document understates the scope of this exemption and that, when read in context, all surface coatings of FMC's fire trucks are exempt so long as production is less than 35 vehicles per day.

The referenced exemption provides as follows:

> "The provisions of 17-2.650(1)(f)14. shall not apply to the surface coating of the following metal parts and products:

(A) Automobiles and light-duty trucks;
(B) Metal cans;
(C) Flat metal sheets and strips in the form of rolls or coils;
(D) Magnet wire for use in electrical machinery;
(E) Metal furniture;
(F) Large appliances;
(G) Exterior of airplanes;
(H) Automobile refinishing;
(I) Customized top coating of automobiles and trucks if production is less than 35 vehicles per day; and
(J) Exterior of marine vessels."
(Emphasis supplied)

On its face, this regulation exempts each of the ten listed categories from all of Section 17-2.650(1)(f)(14)'s surface coating requirements -- not just those pertaining to top coats. Indeed, Section 17-2.650(1)(f)(14) contains no provisions specific to top coats. The category into which FMC is acknowledged by DER to fit, Category I, applies to automobiles and trucks which are custom top coated. FMC believes that the Technical Analysis and Preliminary Determination document has mistakenly confused the categories entitled to the exemption with the exemption itself. We, therefore, request that this interpretation be reconsidered and that FMC be allowed the full exemption to which it is entitled.

While I realize that this letter provides only an overview of FMC's concerns, we hope that it, together with previous correspondence on this subject, will provide a basis for further discussion of these issues. After you have had an opportunity to consider these materials, we would like to meet with DER representatives in an effort to resolve these problems satisfactorily in an amicable fashion. If you have any questions or are in need of any additional information, please call me at (215) 299-6989 or write me at the above address.

Very truly yours,

Kenneth N. Klass
Counsel

cc: Bill Thomas
L.E. McIntyre
R.L. Rhodes, Jr.

0897D30002DTgg

LAW OFFICES

HOLLAND & KNIGHT

406 THIRTEENTH STREET WEST
P. O. BOX 1669
BRADENTON, FLORIDA 33506
(813) 746-7107

110 EAST BROWARD BLVD.
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92 LAKE WIRE DRIVE
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255 SOUTH ORANGE AVENUE
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2033 WOOD STREET
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BARNETT BANK BLDG.
P. O. DRAWER 810
TALLAHASSEE, FLORIDA 32302
(904) 224-7000

600 NORTH FLORIDA AVE.
P. O. BOX 1288
TAMPA, FLORIDA 33601
(813) 223-1621

PLEASE REPLY TO: Tallahassee

888 SEVENTEENTH STREET, N. W.
SUITE 400
WASHINGTON, D. C. 20006
(202) 955-5550

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H&K MIA
TELEX 5-2630-TAMPA
TELEX 52-2233-MIAMI

November 7, 1986

Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Re: FMC Corporation-DER Permit No. AC48-122642
(Our File 18983-6)

Dear Bill:

Please find enclosed an original executed waiver of the ninety-day time limit under Section 120.60(2), Florida Statutes, concerning the matter referenced above. The waiver expires as of February 1, 1987.

If you have any questions, please let me know.

Sincerely,

HOLLAND & KNIGHT

Robert L. Rhodes, Jr.

/cdw
Encl.

cc: Vivian Garfein, Esquire
Kenneth N. Klass
Pradeep Raval - 11/10/86 BR

DER
NOV 10 1986
BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

Permit No. AC48-121642
Applicant's Name: FMC Corporation
OGC File No. 86-1410

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced matter, the applicant hereby with the full knowledge and understanding of its right under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the ninety day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in its self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 1st day of February, 1987.

The undersigned is authorized to make this waiver on behalf of the applicant.

Robert L. Rhodes, Jr.
of HOLLAND & KNIGHT
Attorneys for FMC Corporation

11/6/86
Date

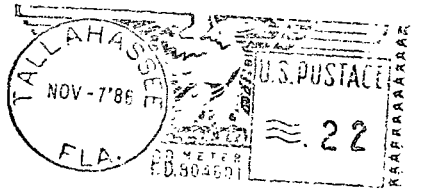
Sworn to and subscribed before me this 6th day of November, 1986.

NOTARY PUBLIC STATE OF FLORIDA

Notary Public

My commission expires: Notary Public, State of Florida My Commission Expires Aug. 20, 1989 Bonded Thru Troy Fain-Insurance Inc.

LAW OFFICES
HOLLAND & KNIGHT
P. O. DRAWER 810
TALLAHASSEE, FLORIDA 32302



Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

FMC Corporation

Airline Equipment Division
7300 Presidents Drive
Box 13400
Orlando Florida 32859
305 851 3377

FMC

October 31, 1986

HAND DELIVERED

Mr. A.T. Sawicki, P.E.
State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Fl 32803

Re: FMC Corporation
Proof of Publication
Proposed Agency Action
Air Permit AC 48-121642

Dear Mr. Sawicki:

Enclosed is the proof of publication of the Notice of Proposed Agency Action for the above referenced air permit. The notice was published in the Orlando Sentinel legal advertising section as required by Florida Administrative Code Rule 17-103.150.

Sincerely,

L E McIntyre

Larry E. McIntyre
Manufacturing Manager

cc: R. Simmons, FMC
B. Thomas, FDER

enclosure

DER
NOV. 5 1986
BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) — INITIAL / DATE

Bill Thomas

2. — INITIAL / DATE

Bureau of Air Quality Manag-

3. Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400 — INITIAL / DATE

4. — INITIAL / DATE

REMARKS:

Attn: M. Raval

DER

NOV 5 1986

BAQM

INFORMATION
- REVIEW & RETURN
- REVIEW & FILE
- INITIAL & FORWARD

DISPOSITION
- REVIEW & RESPOND
- PREPARE RESPONSE
- FOR MY SIGNATURE
- FOR YOUR SIGNATURE
- LET'S DISCUSS
- SET UP MEETING
- INVESTIGATE & REPT
- INITIAL & FORWARD
- DISTRIBUTE
- CONCURRENCE
- FOR PROCESSING
- INITIAL & RETURN

FROM: John Lamm

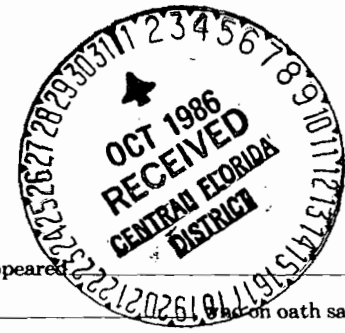
DATE 11-4-86

PHONE

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

State of Florida } SS.
COUNTY OF ORANGE

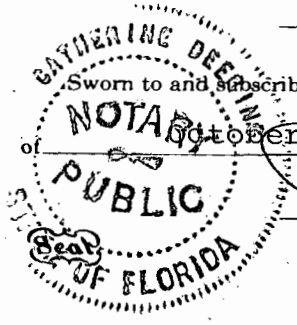


Before the undersigned authority personally appeared Nancy A. Puglia who on oath says that she is the Legal Advertising Representative of the Orlando Sentinel, a Daily newspaper published at Orlando, in Orange County, Florida; that the attached copy of advertisement, being a Notice of Intent in the matter of Permit to FMC Corporation in the _____ Court, was published in said newspaper in the issues of October 19, 1986

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Orlando, in said Orange 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/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Nancy A. Puglia

Sworn to and subscribed before me this 28th day of October A.D. 19 86



Notary Public

Notary Public, State of Florida at Large
My Commission Expires March 4, 1989
Bonded Thru Brown & Brown, Inc.

FORM NO. AD-262

ADVERTISING CHARGE $ 91.61 Paid

State of Florida
Department of
Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to FMC Corporation to authorize an increase in production and to construct a paint drying booth at the applicant's existing facility in Orlando, Orange County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida, 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Dept. of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida, 32803

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

CL-870 Oct.19,1986

P 408 532 083

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Jerry C. Sibley	
Street and No. Box 13400	
P.O., State and ZIP Code Orlando, FL 32859	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date 10/3/86	

PS Form 3800, Feb. 1982

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.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Jerry C. Sibley
FMC Corporation
Box 13400
Orlando, FL 32859

4. Type of Service:	Article Number
☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail	P408532083

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X Russell Simmons

7. Date of Delivery
10/7/86

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

DOMESTIC RETURN RECEIPT

File Copy

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 2, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Jerry C. Sibley
FMC Corporation
Box 13400
Orlando, Florida 32859

Dear Mr. Sibley:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed modified permit to construct a paint spray booth and also a paint drying booth, at your existing facility in Orlando.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/pa

Attachments

cc: D. Dube
R. Simmons
T. Sawicki

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit FMC Corporation to authorize an increase in production and to construct a paint drying booth at the applicant's existing facility in Orlando, Orange County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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

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

Dept. of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

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 Oct. 3, 1986.

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

Kerri Sheldon
Clerk

10/3/86
Date

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

FMC Corporation
Box 13400
Orlando, Florida 32859

DER File No. AC 48-121642

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, FMC Corporation, applied on June 19, 1986, to DER for a modification of a permit to increase production and to construct a paint drying booth at the applicant's existing facility in Orlando, Orange County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copies furnished to:

D. Dube
R. Simmons
T. Sawicki

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

Technical Evaluation
and
Preliminary Determination

FMC Corporation
Orlando, Orange County, Florida

Paint Spray Booths
Permit No. AC 48-121642

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

October 2, 1986

I. Application

A. Applicant

FMC Corporation
Airline Equipment Division
7300 Presidents Drive
Orlando, Florida 32859

B. Project and Location

The applicant proposes to modify their existing facility in Orlando, permitted under AC 48-098145, by increasing production and constructing a paint drying booth. The proposed modification will also accomodate painting of fire trucks in addition to airline ground support equipment. The modification will result in an increase in particulate matter (PM) as well as volatile organic compounds (VOCs) emissions. The annual VOC emissions will reach 142,748 pounds per year from the current 25,509 lb/yr, as a result of the proposed modification.

The UTM coordinates of this facility are Zone 17, 459.8 km East and 3148.2 km North.

C. Sources Reviewed

Initially this FMC facility had two other sources in addition to the paint spray booths, namely a hydraulic tube cleaner and a grit blaster. However, the hydraulic tube cleaner has been dismantled and the grit blaster has been determined to have no emissions to the atmosphere. The proposed paint drying booth will also have virtually no emissions and therefore the only sources that will be reviewed in this technical evaluation will be the four paint booths. FMC currently has three existing paint booths and has a permit to construct the fourth booth.

D. Application Completeness Date

FMC applied for a modification of their existing facility on June 19, 1986. The application was deemed complete on August 4, 1986.

E. Standard Industrial Classification (SIC) Code

FMC's facility in Orlando is classified as:

Group No. 37, Transportation Equipment

Industry Nos. 3711, Fire Department Vehicles
3799, Transportation Equipment, Not Elsewhere Classified

The facility is a minor one as defined by Chapter 17-2, Florida Administrative Code.

II. Project Description

A. Process

FMC manufactures airline ground support equipment and intends to expand the production to include fire trucks. The operation consists of building mild steel parts which are fabricated, welded, assembled, prime painted and finally topcoated. The paints currently utilized are a water borne epoxy primer with 2.9 lb VOC/gallon of coating (excluding water) and a medium solids polyurethane topcoat paint of about 3.5 lb VOC/gal. Other primers and preservative coatings are also used. The facility will operate continuously.

B. Controls

PM emissions generated will be almost insignificant since the paint booths will have water traps as associated controls. VOC emissions from the painting operation will be controlled by crew efficiency and the use of low solvent coatings where available. The facility will control the type and quantity of the paints utilized.

III. Rule Applicability

The proposed project will result in an increase in PM and VOC emissions. It is subject to preconstruction review in accordance with Chapter 403 of the Florida Statutes, and Chapters 17-2 and 17-4 of the Florida Administrative Code (FAC).

The proposed project is located in Orange County, in an area designated as nonattainment for the pollutant ozone in accordance with Rule 17-2.410, FAC.

The proposed project will be a minor modification to a minor facility and will not be subject to the New Source Review for Nonattainment Areas under Rule 17-2.510, FAC.

The proposed project is subject to preconstruction review in accordance with Rule 17-2.520, FAC, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The applicable emission limiting standards are:

a) Rule 17-2.610(3), FAC, for unconfined PM emissions
b) Rule 17-2.620(1), FAC, for VOC emissions
c) Rule 17-2.620(2), FAC, for prohibiting objectionable odors

d) Rule 17-2.650(1)(f)14, FAC, for Surface Coatings of Miscellaneous Metal Parts and Products. This standard under Reasonably Available Control Technology (RACT) has an allowable emission limit of 3.5 lb VOC/gal of coating (excluding water).

The fire truck topcoat is exempt from RACT standards since the production will be less than 35 vehicles per day, in accordance with Rule 17-2.650(1)(f)14.a.(ii)(I), FAC.

Compliance with emission limiting standards will be demonstrated by averaging VOC content of different coatings used on a single line on a 24-hour basis. A coating inventory will also be required to be kept to show compliance. EPA Method 24 will be required in accordance with Rule 17-2.700, FAC.

IV. Source Impact Analysis

A. Emission Limitations

Since all four paint booths require the flexibility to be able to handle a variety of coating applications, the emission limits will be identical for all four booths. The coatings as delivered to the coating applicator, and averaged daily on a per line (per booth) basis, will be restricted to 3.5 lb VOC/gal of coating (0.42 kg VOC/l), excluding water.

The facility will annually emit up to 72 tons of VOC (6 tons per 30 day period) and up to 7.2 tons of PM (0.6 tons per 30 day period).

B. Air Quality Analysis

The technical evaluation of this application determined that ambient air monitoring or modeling would not be required to provide reasonable assurance that Florida's air quality standards would not be violated.

V. Conclusion

Based on the information submitted by the applicant, the technical review concluded that the sources will be in compliance with the state air quality regulations, provided the general and specific conditions of the construction permit are fulfilled.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
FMC Corporation
Airline Equipment Division
7300 Presidents Drive
Orlando, Florida 32859

Permit Number: AC 48-121642
Expiration Date: June 30, 1988
County: Orange
Latitude/Longitude: 28° 27' 43"N/
81° 24' 39"W
Project: Four Paint Spray Booths

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

For the modification of the existing facility by adding a paint drying booth and expanding production of fire trucks and airline ground support equipment.

Construction shall be in accordance with the permit application and plans, documents and reference literature submitted unless otherwise stated in the General and Specific Conditions herein.

Attachments:

1. FMC's application package dated June 19, 1986.
2. DER's letter requesting additional information dated July 18, 1986.
3. FMC's response dated August 1, 1986.

PERMITTEE: FMC Corporation

Permit Number: AC 48-121642
Expiration Date: June 30, 1988

GENERAL CONDITIONS:

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

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

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

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

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

GENERAL CONDITIONS:

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

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

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

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

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

a. a description of and cause of non-compliance; and

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

GENERAL CONDITIONS:

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

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

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

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

GENERAL CONDITIONS:

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

c. Records of monitoring information shall include:

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

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

SPECIFIC CONDITIONS:

1. The facility may operate continuously.

2. Maximum annual allowable emissions shall not exceed 72 TPY (tons per year) for VOC (volatile organic compounds), and 7.2 TPY for PM (particulate matter). Maximum 30 day allowable emissions shall not exceed 6 tons for VOC and 0.6 tons for PM.

3. The VOC allowable emission limiting standard, not to be exceeded, is 3.5 pounds per gallon of coating (0.42 kilograms per liter), less water, delivered to a coating applicator, averaged per line, and on a daily basis.

SPECIFIC CONDITIONS:

4. EPA Method 24 shall be required for each surface coating material to determine volatile matter content, water content, density, volume solids, and weight solids. The paint shall be tested as applied and testing should only be required again if the formula, as applied, changes.

5. The permittee shall maintain accurate record-keeping of the inventory of all paints and solvents used in operation of the 4 spray booths. The permittee shall submit annual reports to the Central Fla. District office as proof of compliance. A special note shall be made in the records to differentiate exempt from non-exempt coatings, with regards to RACT standards.

6. Compliance with the conditions of the permit shall be determined through visual inspection by a Department representative and submittal of paint/solvent records as stated in Condition No. 5. The permittee shall notify the Department 15 days prior to testing.

7. During those times when the facility is being used for spray painting of other related activities where solvent emissions can escape to the atmosphere, the doors shall be closed. Additional precautions, such as covering of solvent containers when not in use, shall be taken to prevent escape of VOC fugitive emissions.

8. The paint spray booth(s) shall not be operated unless the exhaust fan and abatement equipment are functioning properly.

9. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor, off plant property, pursuant to Rule 17-2.620(2), FAC (Florida Administrative Code).

10. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the department must be notified in writing 60 days prior to the expiration of the construction permit and submit a new schedule and request for an extension of the construction permit, (Rule 17-2.09, FAC).

PERMITTEE: FMC Corporation

Permit Number: AC 48-121642
Expiration Date: June 30, 1988

SPECIFIC CONDITIONS:

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with compliance test results and Certificate of Completion, to the department's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (Rules 17-2.22 and 17-4.23, FAC).

If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a complete application. (Rule 17-4.10, FAC)

Upon obtaining an operating permit, the permittee will be required to submit annual test reports on the actual operation and emissions of the facility, such as paint analyses obtained by using EPA Method 24, paint vendors specifications to show concurrence with paint analyses performed, and the annual operating report which contains the quantified and qualified actual pollutant emissions from the facility.

11. Any change in the method of operation, equipment, or operating hours shall be submitted for approval to the department's District office.

12. This permit shall replace previous permit(s) issued for FMC's paint booths.

PERMITTEE: FMC Corporation

Permit Number: AC 48-121642
Expiration Date: June 30, 1988

SPECIFIC CONDITIONS:

Issued this ___ day of_____, 1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

_____
VICTORIA J. TSCHINKEL, Secretary

____ pages attached.

FMC Corporation

Airline Equipment Division
7300 Presidents Drive
Box 13400
Orlando Florida 32859
305 851 3377

August 1, 1986

Certified Mail - Return Receipt Requested

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
Twin Towers Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Re: FMC Corporation
Orlando, Florida
Modification to Permit No. AC 48-098145
Response to 7/18/86 C.H. Fancy Letter

Dear Mr. Fancy:

FMC Corporation, Airline Equipment Division located in Orlando, Florida has received your July 18, 1986 letter requesting additional information needed to process our air permit application which is currently under review by your department. The requested information is provided below.

1. Solvent Washings Handling Practices (Minimization of VOC emissions) - FMC utitilizes small metal containers with lids (1-5 gallons) to store solvent for washing parts and paint equipment. When not in use the container lids are closed to minimize VOC emissions. Virgin solvent is stored in closed 55 gallon drums.

   Personnel that handle paints and solvents are instructed through classroom training sessions performed at least annually and on-the-job training to minimize use and evaporation of solvents.

   Waste solvents are collected in closed containers and handled per the applicable RCRA regulations for liquid wastes and are accounted for in inventory documentation. FMC does not propose to recover vapor emissions from the solvent washings.

2. Replacement of Coatings and Solvents - FMC does not plan to replace coatings or solvents which have greater than 3.5 pounds of VOC per gallon. FMC will, with the exeption of the exempted customized topcoats for the fire trucks, achieve compliance with the RACT Rule by using a combination of paints that average 3.5 pounds of VOC per gallon on a 24-hr basis.

   FMC does not plan replacement for the solvents presently used.

3. Operating Data Substantiating Topcoat Consumption - The operating data substantiating the average topcoat consumption per vehicle is included in Attachment I for airline equipment vehicles and Attachment II for fire trucks.

4. Differentiation of Topcoat Consumption - For compliance purposes, FMC will differentiate topcoat consumption for trucks and airline ground units by:

   a. Use of seperate paint manufacturers.

   b. Use of unique part numbers identifying each paint.

Please contact Russell Simmons at the above address if you have any questions pertaining to the above information or to the submitted permit application.

Sincerely,

L E McIntyre

Larry E. McIntyre
Manufacturing Manager

attachment

cc: R. Simmons, FMC
D. Dube, FMC
T. Sawicki, FDER
J. Tessitore

ATTACHMENT I

TOPCOAT PAINT CONSUMPTION
FOR AIRLINE EQUIPMENT VEHICLES

A. 1985 Topcoat Paint Consumption: 3,443 gallons *

B. 1985 Equivalent Vehicle Production: 221 vehicles *

C. Consumption Per Equivalent Vehicle:

$$\frac{3{,}443 \text{ gallons}}{221 \text{ Vehicles}} = 15.6 \text{ gallons/vehicle}$$

Vehicle Production

Product	1985 Production Qty*	Equiv Factor	1985 Equiv Vehicles
Lower Lobe Loaders (JCPL & JCL)	135	1.0	135
Main Deck Loader (MDL)	8	2.0	52
Belt Loader (EBL)	48	0.4	19
Universal Baggage Loader (UBL)	23	0.3	7
Container Pallet Transporter (CPT)	1	0.4	0.4
Total Vehicles	241		221

* Topcoat paint quantity is shown catalyzed and reduced as applied at the paint spray gun.

Paint consumption was obtained from the 1985 paint records adjusted for starting and ending inventories. Vehicle production quantity was obtained from 1985 facility production records and adjusted to determine equivalent quantity of lower lobe loaders. Paint consumption and unadjusted vehicle production figures are documented in the 1985 Annual Operating Report, dated February 28, 1986, for the FMC facility permit No. AC48-098145.

Equivalent Vehicles (Lower Lobe Loaders). The equivalence of paint usage on products manufactured at FMC compared to a Model JCPL2 Lower Lobe Loader.

ATTACHMENT II

TOPCOAT PAINT
CONSUMPTION FOR FIRE TRUCKS

Topcoat paint usage information for fire truck vehicles was obtained from the FMC Corporation manufacturing facility in Tipton, Indiana (that facility has been shut down).

Paint usage information obtained by phone from the Tipton paint department was confirmed by the plant industrial engineering department based on paint usage studies. Reported topcoat paint usage was 14 gallons per vehicle.

The FMC Orlando facility has preliminary usage data, shown below, from production of 14 vehicles in 4 weeks, June 23 - July 20, 1986. Based on that limited production the usage was 12.1 gallons per vehicle. We believe this data from the startup production of fire truck vehicles confirms the Tipton topcoat usage data.

A. Topcoat Paint Consumption: 133 gallons *
(6/23 - 7/20/86)

B. Vehicles Painted: 11 trucks
(6/23 - 7/20/86)

C. Consumption Per Vehicle:

$$\frac{133 \text{ gallons}}{11 \text{ trucks}} = 12.1 \text{ gallons/truck}$$

* Topcoat paint receipt quantity includes catalyst and solvent (e.g. catalyzed and reduced).

P 408 532 095

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Jerry Sibley	
Street and No. FMC Corp / Box 13400	
P.O. State and ZIP Code Orlando, Fl 32859	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, Feb. 1982

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.

1. ☑ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Jerry Sibley
FMC Corp.
Box 13400
Orlando, Fl 32859

4. Type of Service:
☐ Registered ☐ Insured
☑ Certified ☐ COD
☐ Express Mail

Article Number: P408 532 095

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery
JUL 29 1986

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

DOMESTIC RETURN RECEIPT

file.

BEST AVAILABLE COPY

AC 48-121642

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

July 18, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jerry C. Sibley
FMC Corporation
Box 13400
Orlando, Florida 32859

Dear Mr. Sibley:

Re: Modification to Permit No. AC 48-098145

The department has received and reviewed your application package dated June 18, 1986, regarding the above referenced modification. To process your application further, please submit the following information with all the necessary assumptions, calculations, and reference materials:

1. What solvent washings handling practices do you use that minimize VOC emissions? Do you propose to recover any of the solvents? If so, how will you account for it?

2. Do you intend to replace any coatings or solvents which have greater than 3.5 pounds of VOC per gallon?

3. Submit operating data substantiating the average topcoat consumption per truck and airline ground unit.

4. How do you intend to differentiate, for compliance purposes, topcoat consumption for trucks and airline ground units, since one is exempt under RACT and the other is not?

The department does have your request for extension under consideration for Permit No. AC 48-098145, but will incorporate that request into the modification application.

If you have any questions, please contact Pradeep Raval at (904)488-1344 or write to me at the above address.

Sincerely,

for C. H. Thomas

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

CHF/PR/s

cc: D. Dube
R. Simmons
T. Sawicki

FMC Corporation

Airline Equipment Division
7300 Presidents Drive
Box 13400
Orlando Florida 32859
305 851 3377

FMC

June 20, 1986

Mr. William A. Thomas, P.E.
Chief Engineer
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Mr. Thomas:

In error the permit applications(3 copies) were sent to you without payment for the processing fee. Enclosed with this letter is the proper payment.

Also note that one additional copy of the permit application has been delivered to A.T.Sawicki at the FDER St. Johns River District office in Orlando. That copy makes a total of four copies sent to FDER.

Please contact me if you have any questions pertaining to this payment or to the permit application.

Sincerely,

Russell Simmons

Russell Simmons
Manufacturing Engineer

enclosure

FMC Corporation
Airline Equipment Division
Orlando, Florida 32809

THIS CHECK IS TENDERED IN FULL PAYMENT OF ITEMS LISTED BELOW

037538

VOUCHER NUMBER	VENDOR INVOICE DATE	NUMBER	AMOUNT	DISCOUNT	PAYMENT AMOUNT
	06/20/86	CKRQ 1139	400.00	.00	400.00
				TOTAL AMOUNT PAID ▶	400.00

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

FMC Corporation
Airline Equipment Division
Orlando, Florida 32809

TEXAS COMMERCE BANK
LUBBOCK, TEXAS

88-436
1113

37538
CHECK NUMBER

PAY

DATE	AMOUNT
06/20/86	********400.00 ****400.00*****

TO THE ORDER OF DEPARTMENT OF ENVIRONMENTAL REGULATION

AUTHORIZED SIGNATURE

COUNTERSIGNED

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

[redacted]

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No 76127

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from FMC Corporation Date June 30, 1986

Address Box 13400 Orlando, FL 32859 Dollars $ 400.00

Applicant Name & Address Same as above

Source of Revenue

Revenue Code 001031 Application Number AC 48-121642

By Patricia B. Adams

FMC Corporation

Airline Equipment Division
7300 Presidents Drive
Box 13400
Orlando Florida 32859
305 851 3377

June 19, 1986

Mr. William A. Thomas, P.E.
Chief Engineer
Bureau of Air Quality Management
State Of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl 32301

Re: Application To Modifiy Air Permit
Number AC 48-098145

Dear Mr. Thomas:

The FMC Corporation facility, located in Orange County at the above address, is submitting the attached application for modification of Air Permit # AC48- 098145 for an increase in VOC emissions and operation of four (4) paint spray booths. This application is being submitted because FMC will experience an increase in production of vehicles as a result of the consolidation of production from an older FMC facility with that of the modern Orlando facility.

Enclosed with this application is a $400.00 processing fee.

As discussed with you during our May 29th meeting FMC is submitting this application in order to expand the production of vehicles to include fire trucks and airline ground support equipment.

The application for a modified permit proposes:

a) Increasing the present annual VOC emission limit to 142,748 pounds per year. This limit, as outlined in the application, is based on the maximum projected annual production levels of all FMC vehicles through 1991.

b) Retaining the current permit approach of not setting a daily emission limit for VOCs. This will allow for normal uninterrupted painting of the large vehicles on any day. Otherwise, paint finish quality can be adversely affected if completion of a vehicle must be spread over a time frame greater than one day. This could occur if the coatings line must shut down if a specified daily emission limit, particularly a low pro rata limit, is reached prior to completion of a vehicle.

Finish painting of a partially completed vehicle the following day would result in paint overspray and flowing problems. As a result FMC would need to perform costly paint rework. Furthermore, such rework would create additional VOC emissions because of increased paint usage.

If a daily VOC emission limit is required FMC requests the limit be no less than 894 pounds on any single day, based on the maximum projected number of vehicles that could be painted in a day. The daily maximum would not be attained on most operating days but could conceivably be attained on certain days, depending on scheduling of parts and vehicles through the paint processes.

c) Using the RACT Rule exemption for customized topcoating of trucks (fire trucks) with production less than 35 vehicles per day (Florida Administrative Code 17-2.650(1)(f)14.a.(ii)(I). FMC requests that a permit condition confirm the applicability of this exemption to the topcoating of fire truck vehicles at this facility.

d) Complying with RACT emissions by averaging of non-exempt coatings within the entire coating line of customized wheeled vehicles, which includes fire trucks and airline ground support vehicles. The coating line includes the priming and topcoating processes because each of the coatings utilized may be applied in any of the four paint spray booths, depending on production scheduling requirements.

RACT Compliance would be on a 24 hour basis.

e) The paint coating application for wheeled vehicles, i.e. fire trucks and airline ground support equipment, will occur on one paint coating line which will use the same prime paint booths and prime paint coating for parts and subassemblies of all vehicles. As with our current permit, we request that one total VOC emission limit be applied to the one coating line as described in the application. Compliance with booth-by-booth emission limits is not feasible in the production of a small number of large vehicles.

f) Installing of a fourth paint spray booth which is allowed for in the present permit.

g) Installing a paint drying booth to complete the paint drying operation for vehicles painted and partially dried in a paint booth, e.g. the fourth paint booth. The drying booth will not cause any additional VOC emissions. There will be no combustion source for the drying booth.

Confirming our understanding from the meeting with you, FMC may construct and may proceed to operate the fourth paint spray booth and paint drying oven within the next few months (possibly before issuance of the new permit). Installation of both booths need not be delayed until issuance of the new permit since the paint spray booth has been previously approved and the paint drying oven will not be a source of new emissions.

We plan to schedule a meeting with you and appropriate members of your staff to review this application in about a week. We request the meeting so we can clarify items as needed to facilitate your processing of this application.

Please contact me or Russell Simmons at the above number if there are any questions regarding this permit application.

Sincerely,

Jerry C. Sibley
Division Manager

cc: R.Simmons, FMC AED
D.Dube, FMC EPD
A.T.Sawicki, FDER St Johns River District

enclosure

DEPARTMENT OF ENVIRONMENTAL REGULATION

AC 48-121642

DER

JUN 20 1986

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Manufacturing [ ] New[1] [X] Existing[1]

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

COMPANY NAME: FMC Corp Airline Equipment Division COUNTY: Orange

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) Four (4) Paint Spray Booths

SOURCE LOCATION: Street 7300 Presidents Drive City Orlando

UTM: East 459-800 North 3148-200

Latitude 28 ° 27 ' 43 "N Longitude 81 ° 24 ' 39 "W

APPLICANT NAME AND TITLE: Mr. Jerry C. Sibley, Division Manager

APPLICANT ADDRESS: 7300 Presidents Drive, Orlando, FL 32809

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of FMC Corporation

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

*Attach letter of authorization

Signed: Jerry C. Sibley

Mr. Jerry C. Sibley, Division Manager
Name and Title (Please Type)

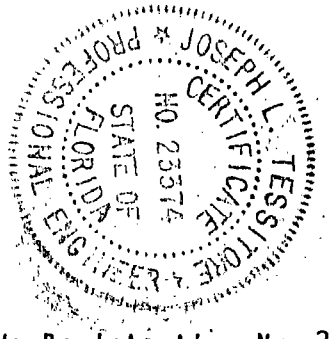
Date: 6-19-86 Telephone No. 305/851-3377

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

[1] 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 Joseph L. Tessitore

Joseph L. Tessitore
Name (Please Type)

Cross/Tessitore & Associates, P.A.
Company Name (Please Type)

4759 S. Conway Road, Suite D, Orlando, FL 32812
Mailing Address (Please Type)

Florida Registration No. 23374 Date: 6/16/86 Telephone No. 305/851-1484

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.

See Attachment II-A

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

Start of Construction July 1, 1986 Completion of Construction July 1, 1987

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.)

$65,000.00

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

Permit # A048-70342	Permit # AC 48-098145
Issued 28 Oct. 1983	Issued 23 Sept. 1985
Expiration Date: 25 Oct. 1988	Expiration Date: 30 June 1987

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr _____; if seasonal, describe: _____

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? Yes

   a. If yes, has "offset" been applied? No

   b. If yes, has "Lowest Achievable Emission Rate" been applied? No

   c. If yes, list non-attainment pollutants. Oxidants

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

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, aee 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? Yes

   a. If yes, for what pollutants? Volatile Organic Compounds (VOC)

   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 justification 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		
See Attachment	III-A			See Attachment
				V-6

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

1. Total Process Input Rate (lbs/hr): See Attachment V-1

2. Product Weight (lbs/hr): See Attachment V-1

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[2] 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/hr	T/yr	
VOC[1]	37.3	71.4	3.5 lbs	37.5[2]	37.3	71.4	See Attachment
			per gallon				V-6
Particulate	0.35	0.71	Process Wt. Table	0.55[2]	35.0	71.0	

[1] See Section V, Item 2.

[2] Reference 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)

[3] Calculated from operating rate and applicable standard.

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

(1) Based on Maximum Daily VOC Emissions and Maximum Annual Emissions See Attachment V-2

(2) See Attachment V-2

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Despatch & Protectaire	Particulate	99%		Manufactures
Downdraft Water				Data
Wash Paint Booth				

E. Fuels

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

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

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

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

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

Annual Average _____ Maximum _____

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

Paint booth water will be treated on-site and discharge to county sewer, or disposed off-site according to FDER regulations. Paint booth sludges will be disposed off-site according to FDER regulations.

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

Stack Height: * ft. Stack Diameter: * ft.

Gas Flow Rate: * ACFM * DSCFM Gas Exit Temperature: * °F.

Water Vapor Content: * % Velocity: * FPS

*See attachment III-H

SECTION IV: INCINERATOR INFORMATION

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 Diamter: _____ 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)]
   See Attachment V-1
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. See Attachment V-2
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
   See Attachment V-2
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. See Attachment V-6
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).
   See Attachment V-7
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.
   See Attachment V-8

FMC CORPORATION
ORLANDO, FLORIDA
PROCESS DESCRIPTION

FMC Corporation operates a manufacturing facility located within Orange County at 7300 Presidents Drive, Orlando, Florida. FMC has and will continue to manufacture at this location airline ground support vehicles which are sold to commercial airlines worldwide for use in loading and unloading both cargo and containerized cargo to and from airplanes. These vehicles are built using mild steel structures and components which are fabricated, welded, assembled, tested and painted. FMC presently operates the painting facilities under Florida DER Construction Permit #AC48-098145.

This FMC facility is in the process of broadening the current product line to include fire trucks which were previously manufactured at a much older FMC plant in Tipton, Indiana. The increased production will continue to include airline ground support vehicles and require the utilization of a common work force, equipment, and manufacturing processes.

FMC fire trucks are sold worldwide to customers demanding modern and dependable emergency fire fighting vehicles. These trucks are built by attaching customized steel, aluminum, stainless steel, and/or galvanized steel bodies and parts, manufactured by FMC, to truck chassis supplied by truck manufacturers. Once assembled they are painted.

FMC needs a permit modification which includes an increase of the VOC emissions limit capacity to accommodate the higher production levels and resultant paint usage.

As early as July 1986 FMC plans to install a fourth paint booth (presently authorized by FMC's existing DER Permit No. AC48-098145), and a separate new paint drying booth which will be used to complete the paint drying operation of painted vehicles. The drying booth will not cause additional VOC emissions and will not include any combustion source to provide heat (see Attachment III-H and V-8 for stack geometry and location, respectively.)

Projected maximum annual and maximum daily paint and solvent usage for the production of all vehicles is described in Attachment III-A. The usage rates for airline ground support vehicles have been revised to reflect the actual paint consumption of primer and topcoat paints experienced during the last 12 months.

FMC presently utilizes paints that consist of a water-borne epoxy primer at 2.9 pounds VOC per gallon (excluding water) and medium-solids polyurethane topcoat paints which average under 3.5 pounds VOC per gallon. FMC will continue use of these or similar paints on airline ground support vehicles. The water-borne primer will also be used on fire trucks along with various other primers, custom topcoat paints, and preservative coatings as shown in Attachment III-A.

The topcoat paints used for the fire trucks are exempt from RACT under Florida Administrative Code (FAC) Rule 17-2.650(1)(f)14.a.(ii)(I) for customized topcoating of trucks since production will be less than 35 vehicles per day.

Compliance with the 3.5 pounds VOC RACT Rule for all nonexempt coatings will be achieved for the coating line by averaging within the total line of vehicles to be produced. The line for coating all vehicles includes primers, topcoats (except the customized topcoat mentioned above) and protective coatings that will be applied in any or all of the paint booths (See Process Flow Diagram, Attachment V-6).

Compliance with the RACT Rule will be on a 24-hour basis.

FMC will control the type and quantity of paints applied, using material balance methods, to ensure compliance with the RACT emission limits. Daily compliance will be controlled by specifying a paint allotment based on the usage (mixture) of coatings to be applied. Written records will monitor daily compliance. The record will show daily and cumulative year-to-date paint usage and, based on VOC analyses of paints (as applied), the daily and cumulative VOC emissions. That information will be monitored routinely by a representative of the permit signatory.

Present allowable VOC emissions need to be increased to 142,748 pounds per year. This is based on the maximum projected production levels of all FMC vehicles through 1991.

FMC prefers that no daily limit be specified in the permit to allow for normal uninterrupted painting of the large vehicles on any day. Paint finish quality can be adversely affected if completion of a vehicle must be spread over several days. This could occur in the event the coatings line must cease to operate if a specified daily emission limit, particularly a low limit, is reached prior to completion of a vehicle. For instance, the topcoat paints need to remain wet or tacky during completion of each paint job. Finishing a job the following day when the paint is dry would result in paint overspray and flowing problems. This can create costly paint rework and cause additional VOC emissions because of increased paint usage.

If a daily maximum VOC limit is required, FMC requests that the limit be no less than 894 pounds on any single day, based on the maximum projected number of vehicles that could be painted in a day (see Attachment V-2). The daily maximum would not be attained on most operating days but could conceivably be attained on certain days, depending on scheduling of parts and vehicles through the paint process line.

FMC will maintain compliance with the maximum annual and, if specified, maximum daily VOC emission limits.

Operating hours remain at 24 hours per day, 365 days per year. The individual paint booths will not operate continuously, however, for efficient scheduling of coating application the booths will be operated intermittently on any shift.

FMC needs a single modified permit written to specify one (1) total VOC emission limit for all booths combined and not on a booth-by-booth basis. The proposed permit would be similar to the existing permit which specifies one total VOC emission limit for all four booths combined. This one combined limit is needed because FMC cannot predict the quantity of coatings applied in a specific paint spray booth (nor the resultant emissions) due to the monthly variations of product mix.

In addition, this permit should not limit the product mix of vehicles since facility compliance with the emission limits and the other conditions of the permit will control the facility impact on ambient air quality.

All calculations in this application for permit modification have been developed based on maximum anticipated production levels through 1991. All VOC figures are based on VOC content of the paint as applied at the gun (catalyzed and reduced).

ATTACHMENT III-A

MAXIMUM ANNUAL COATING UTILIZATION AND VOC EMISSIONS

COATING	A #VOC/GAL EX WATER	B %VOLUME SOLIDS	C %VOLUME SOLVENTS	D SOLVENT DENSITY (#/GAL) (A/C)	E #VOC/GAL SOLIDS (#/GAL) (A/B)	F APPL RATE (GAL/UNIT)	G QTY UNITS	H GALLONS COATINGS APPLIED (F*G)	I GALLONS SOLIDS APPLIED (B*H)	J # VOC EMITTED (E*I)	K DENSITY (#/GAL)	L TOTAL PAINT (#/YR) (H*K)
PRIMER:												
LL.LOADER	2.9	62.8%	37.2%	7.8	4.6	9.0	150	1350	848	3,915	12.7	17,199
MDL40	2.9	62.8%	37.2%	7.8	4.6	21.0	30	630	396	1,827	12.7	8,026
B.LOADERS	2.9	62.8%	37.2%	7.8	4.6	4.0	150	600	377	1,740	12.7	7,644
BAG CARTS	2.9	62.8%	37.2%	7.8	4.6	1.0	1,300	1300	816	3,770	12.7	16,562
TRAILERS	2.9	62.8%	37.2%	7.8	4.6	1.0	1,200	1200	754	3,480	12.7	15,288
UBL2	2.9	62.8%	37.2%	7.8	4.6	3.0	22	66	41	191	12.7	841
CPT3	2.9	62.8%	37.2%	7.8	4.6	3.0	6	18	11	52	12.7	229
FIRE TRUCKS												
EPOXY PRIMER	2.9	62.8%	37.2%	7.8	4.6	10.5	600	6,300	3,956	18,270	12.7	80,262
SEALER PRIMER	4.5	37.4%	62.6%	7.1	11.9	1.5	600	900	337	4,005	9.3	8,379
WASH PRIMER	5.4	16.6%	83.4%	6.5	32.6	1.5	600	900	150	4,878	7.4	6,651
TOTAL PRIMER:								13,264	7,686	42,129		161,081
TOPCOAT:												
LL.LOADER	3.5	48.7%	51.3%	6.8	7.2	15.0	150	2250	1,096	7,875	9.0	20,318
MDL40	3.5	48.7%	51.3%	6.8	7.2	27.0	30	810	394	2,835	9.0	7,314
B.LOADERS	3.5	48.7%	51.3%	6.8	7.2	5.0	150	750	365	2,625	9.0	6,773
BAG CARTS	3.5	48.7%	51.3%	6.8	7.2	1.0	1,300	1300	633	4,550	9.0	11,739
TRAILERS	3.5	48.7%	51.3%	6.8	7.2	1.5	1,200	1800	877	6,300	9.0	16,254
UBL2	3.5	48.7%	51.3%	6.8	7.2	4.0	22	88	43	308	9.0	795
CPT3	3.5	48.7%	51.3%	6.8	7.2	6.0	6	36	18	126	9.0	325
FIRE TRUCKS	4.3	39.0%	61.0%	6.8	10.9	14.0	600	8,400	3,276	35,712	8.3	69,384
TOTAL TOPCOAT:								15,434	6,702	60,331		132,901
OTHER COATINGS:												
XPORT PRESERV	0.44	18.8%	81.3%	0.5	2.3	2.0	300	600	113	264	9.1	5,448
TANK COATING	2.88	68.0%	36.9%	7.8	4.2	9.5	600	5,700	3,876	16,416	11.2	64,068
UNDERCOATING	3.20	58.0%	39.5%	8.1	5.5	2.1	600	1,266	734	4,051	7.8	9,900
CLEANUP SOLVENT	6.70	0.0%	100.0%	6.7	N/A			2,919	0	19,557	6.7	19,557
TOTAL OTHER COATINGS:								10,485	4,723	40,288		98,973

TOTAL VOC EMISSIONS: 142,748 LBS VOC

VOC/GAL AVE (EXCL. FIRE TRUCK TOPCOAT): 3.48 LBS VOC/GAL

DAILY MAXIMUM COATING UTILIZATION AND VOC EMISSIONS

COATING	A #VOC/GAL EX WATER	B %VOLUME SOLIDS	C %VOLUME SOLVENTS	D SOLVENT DENSITY (#/GAL) (A/C)	E #VOC/GAL SOLIDS (#/GAL) (A/B)	F APPL RATE (GAL/UNIT)	G QTY UNITS	H GALLONS COATINGS APPLIED (F*G)	I GALLONS SOLIDS APPLIED (B*H)	J # VOC EMITTED (E*I)	K DENSITY (#/GAL)	L TOTAL PAINT (#) (H*K)
PRIMER:												
LL.LOADER	2.9	62.8%	37.2%	7.8	4.6	9.0	0.7	6.3	4.0	18.3	12.7	80.3
MDL40	2.9	62.8%	37.2%	7.8	4.6	21.0	0.1	2.1	1.3	6.1	12.7	26.8
B.LOADERS	2.9	62.8%	37.2%	7.8	4.6	4.0	0.6	2.4	1.5	7.0	12.7	30.6
BAG CARTS	2.9	62.8%	37.2%	7.8	4.6	1.0	0.0	0.0	0.0	0.0	12.7	0.0
TRAILERS	2.9	62.8%	37.2%	7.8	4.6	1.0	22.0	22.0	13.8	63.8	12.7	280.3
UBL2	2.9	62.8%	37.2%	7.8	4.6	3.0	0.1	0.3	0.2	0.9	12.7	3.8
CPT3	2.9	62.8%	37.2%	7.8	4.6	3.0	0.0	0.0	0.0	0.0	12.7	0.0
FIRE TRUCKS												
EPOXY PRIMER	2.9	62.8%	37.2%	7.8	4.6	10.5	2.4	25.2	15.8	73.1	12.7	321.0
SEALER PRIMER	4.5	37.4%	62.6%	7.1	11.9	1.5	3.0	4.5	1.7	20.0	9.3	41.9
WASH PRIMER	5.4	16.6%	83.4%	6.5	32.6	1.5	3.0	4.5	0.7	24.4	7.4	33.3
TOTAL PRIMER:								67.3	39.0	213.5		817.9
TOPCOAT:												
LL.LOADER	3.5	48.7%	51.3%	6.8	7.2	15.0	1	15.0	7.3	52.5	9.0	135.5
MDL40	3.5	48.7%	51.3%	6.8	7.2	27.0	1	27.0	13.1	94.5	9.0	243.8
B.LOADERS	3.5	48.7%	51.3%	6.8	7.2	5.0	1	5.0	2.4	17.5	9.0	45.2
BAG CARTS	3.5	48.7%	51.3%	6.8	7.2	1.0	0	0.0	0.0	0.0	9.0	0.0
TRAILERS	3.5	48.7%	51.3%	6.8	7.2	1.5	22	33.0	16.1	115.5	9.0	298.0
UBL2	3.5	48.7%	51.3%	6.8	7.2	4.0	0	0.0	0.0	0.0	9.0	0.0
CPT3	3.5	48.7%	51.3%	6.8	7.2	6.0	0	0.0	0.0	0.0	9.0	0.0
FIRE TRUCKS	4.3	39.0%	61.0%	6.8	10.9	14.0	3	42.0	16.4	178.6	8.3	346.9
TOTAL TOPCOAT:								122.0	55.3	458.6		1069.3
OTHER COATINGS:												
XPORT PRESERV	0.44	18.8%	81.3%	0.5	2.3	2.0	3	6.0	1.1	2.6	9.1	54.5
TANK COATING	2.88	68.0%	36.9%	7.8	4.2	9.5	3	28.5	19.4	82.1	11.2	320.3
UNDERCOATING	3.20	58.0%	39.5%	8.1	5.5	2.1	3	6.3	3.7	20.3	7.8	49.5
CLEANUP SOLVENT	6.70	0.0%	100.0%	6.7	N/A	N/A	N/A	17.5	0.0	117.3	6.7	117.3
TOTAL OTHER COATINGS:								58.3	24.2	222.3		541.7

TOTAL VOC EMISSIONS: 894 LBS VOC

VOC/GAL AVE (EXCL. FIRE TRUCK TOPCOAT): 3.48 LBS VOC/GAL

ATTACHMENT III-H

STACK GEOMETRY AND FLOW DATA

SPRAY BOOTH	STACKS	STACK HEIGHT (FT)	STACK DIAMETER (FT)	TOTAL GAS FLOW (ACFM)*	GAS VELOCITY (FPS)
1	1	40	4.00	30,000	40
2	4	40	2.83	100,000	67
3	4	40	4.00	120,000	40
4	4	43	3.50	80,000	35

* All gas flows based on a gas temperature of 70 degrees F.

Attachment V-1

Process Input Rate and Product Weight Derivation

Maximum Annual

A. Total Process Input Rate

1. Prime Paint Utilization

a. Epoxy Primer = (11,464 gal/yr) x (12.7 #/gal) ÷ (8760 hr/yr) = 16.62 #/hr

b. Primer Sealer = (900 gal/yr) x (9.3 #/gal) ÷ (8760 hr/yr) = 0.95 #/hr

c. Wash Primer = (900 gal/yr) x (7.4 #/gal) ÷ (8760 hr/yr) = 0.76 #/hr

d. Total Primer Paint = (16.62 + 0.95 + 0.76) = 18.33 #/hr

2. Topcoat Paint Utilization

a. Med. Solids = (7034 gal/yr) x (9.0 #/gal) ÷ (8760 hr/yr) = 7.23 #/hr

b. Custom = (8400 gal/yr) x (8.3 #/gal) ÷ (8760 hr/yr) = 7.96 #/hr

c. Total Topcoat Paint = (7.23 + 7.96) = 15.19 #/hr

3. Miscellaneous Utilization

a. Preservative = (600 gal/yr) x (9.1 #/gal) ÷ (8760 hr/yr) = 0.62 #/hr

b. Tank Coating = (5700 gal/yr) x (11.2 #/gal) ÷ (8760 hr/yr) = 7.29 #/hr

c. Undercoating = (1266 gal/yr) x (7.8 #/gal) ÷ (8760 hr/yr) = 1.13 #/hr

d. Cleanup Solvents = (2919 gal/yr) x (6.7 #/gal) ÷ (8760 hr/yr) = 2.23 #/hr

e. Total Miscellaneous = (0.62 + 7.29 + 1.13 + 2.23) = 11.27 #/hr

4. Total Process Input Rate

(18.33 + 15.19 + 11.27) = 44.79 #/hr

B. Total Product Weight (Annual)

1. Prime Paint Utilization

a. Epoxy Primer = (16.62 #/hr) x (1-22.8% VOC) = 12.83 #/hr

b. Primer Sealer = (0.95 #/hr) x (1-47.8% VOC) = 0.50 #/hr

c. Wash Primer = (0.76 #/hr) x (1-73.3% VOC) = 0.20 #/hr

d. Total Prime Paint = (12.83 + 0.50 + 0.20) = 13.53 #/hr

2. Topcoat Paint Utilization

a. Medium Solids = (7.23 #/hr) x (1-38.8% VOC) = 4.42 #/hr

b. Custom = (7.96 #/hr) x (1-51.5% VOC) = 3.86 #/hr

c. Total Topcoat Paint (4.42 + 3.86) = 8.28 #/hr

3. Miscellaneous Utilization

a. Preservative = (0.62 #/hr) x (1-4.8% VOC) = 0.59 #/hr

b. Tank Coating = (7.29 #/hr) x (1-25.6% VOC) = 5.42 #/hr

c. Undercoating = (1.13 #/hr) x (1-40.9% VOC) =

0.67 #/hr

d. Cleanup Solvents = (2.23 #/hr) x (1-100% VOC) =

0

e. Total Miscellaneous (0.59 + 5.42 + 0.67 + 0) =

6.68 #/hr

4. Total Product Weight (Annual)

(13.53 + 8.28 + 6.68) = 28.49 #/hr

MAXIMUM DAILY

A. Total Input Process Weight

1. Prime Paint Utilization

a. Epoxy Primer = (58.3 gal) x (12.7#/gal)

÷ (24 hrs) = 30.85 #/hr

b. Primer Sealer = (4.5 gal) x (9.3 #/gal)

÷ (24 hrs) = 1.74 #/hr

c. Wash Primer = (4.5 gal) x (7.4 #/gal)

÷ (24 hrs) = 1.39 #/hr)

d. Total Prime Paint = (30.85 + 1.74 + 1.39)

= 33.98 #/hr

2. Topcoat Paint Utilization

a. Medium Solids = (80 gal) x (9.0 #/gal)

÷ (24 hrs) = 30.00 #/hr

b. Custom = (42 gal) x (8.3 #/gal) ÷ (24 hrs)

= 14.53 #/hr

c. Total Topcoat Paint = (30.00 + 14.53) = 44.53 #/hr

3. Miscellaneous Utilization

a. Preservative = (6 gal) x (9.1 #/gal)
÷ (24 hrs) = 2.28 #/hr

b. Tank Coating = (28.5 gal) x (11.2 #/gal)
÷ (24 hrs) = 13.30 #/hr

c. Undercoating = (6.3 gal) x (7.8 #/gal)
÷ (24 hrs) = 2.05 #/hr

d. Cleanup Solvents = (17.5 gal) x (6.7 #/gal)
÷ (24 hrs) = 4.89 #/hr

e. Total Miscellaneous = (2.28 + 13.30 + 2.05 + 4.89) = 22.52 #/hr

4. Total Input Process Weight (Daily Max)

(33.98 + 44.53 + 22.52) = 101.03 #/hr

B. Total Product Weight

1. Prime Paint Utilization

a. Epoxy Primer = (30.85 #/hr) x (1-22.8% VOC)
= 23.82 #/hr

b. Primer Sealer = (1.74 #/hr) x (1-47.8% VOC)
= 0.91 #/hr

c. Wash Primer = (1.39 #/hr) x (1-73.3% VOC)
= 0.37 #/hr

d. Total Prime Paint = (23.82 + 0.91 + 0.37)
= 25.10 #/hr

2. Topcoat Paint Utilization

a. Medium Solids = (30.00 #/hr) x (1-38.8% VOC)
= 18.36 #/hr

b. Custom = (14.53 #/hr) x (1-51.5% VOC)

= 7.05 #/hr

c. Total Topcoat Paint = (18.36 + 7.05)

= 25.41 #/hr

3. Miscellaneous Utilization

a. Preservative = (2.28 #/hr) x (1-4.8% VOC)

= 2.17 #/hr

b. Tank Coating = (13.30 #/hr) x (1-25.6% VOC)

= 9.90 #/hr

c. Undercoating = (2.05 #/hr) x (1-40.9% VOC)

= 1.21 #/hr

d. Cleanup Solvents = (4.89 #/hr) x (1-100% VOC)

= 0 #/hr

e. Total Miscellaneous = (2.17 + 9.90 + 1.21 + 0.00)

= 13.28 #/hr

4. Total Product Weight (Daily Maximum)

(25.10 + 25.41 + 13.28) = 63.79 #/hr

CALCULATION OF ALLOWABLE EMISSIONS

1) Particulate

Maximum Daily

Total Paint = 2428.9 lb/day = 101.2 lbs/hr

= 0.051 tons/hour

From Process Weight Table 610-1, allowable emission rate is 0.55 lbs/hr

Maximum Annual

Total Paint = 392,955 lbs/yr = 196.5 tons/yr

Average Hourly Rate = 0.0224 tons/hr

Allowable = E = 3.59 p (0.62) = 0.34 lbs/hr

2) VOC

Maximum Daily

Gallons of Coating = 247.6 gallons/day

Gallons of Topcoat (Exempt) 42.0 gallons/day

Allowable Emissions = (247.6-42.0)(3.5)

+ (42.0)(4.3) = 719.6 + 180.6

= 900.2 lbs/day

= 37.5 lbs/hr

Maximum Annual

Gallons of Coatings = 39,183 gallon/yr

Gallons of Topcoat (Exempt) = 8400 gallons/yr

Allowable Emissions = (39,183-8400)(3.5)

+ (8400)(4.3) = 143,861 lbs/yr

= 71.9 tons/year

ATTACHMENT V-2

SUMMARY EMISSIONS

	ANNUAL		DAILY *	
	VOC (LBS)	PARTICULATE (LBS)	VOC (LBS)	PARTICULATE (LBS)
PRIMER PAINTS:	42,129	8,327	213	42.3
TOPCOAT PAINTS:	60,331	3,266	459	27.5
MISC. COATINGS:	40,288	2,641	222	14.4
TOTAL:	142,748	14,233	894	84.2

* MAXIMUM AT PEAK RATE

COATING	A #VOC/GAL EX WATER	B %VOLUME SOLIDS	C %VOLUME SOLVENTS	D SOLVENT DENSITY (#/GAL) (A/C)	E #VOC/GAL SOLIDS (#/GAL) (A/B)	F APPL RATE (GAL/UNIT)	G QTY UNITS	H GALLONS COATINGS APPLIED (F*G)	I GALLONS SOLIDS APPLIED (B*H)	J # VOC EMITTED (E*I)	K DENSITY (#/GAL)	L TOTAL PAINT (#/YR) (H*K)	M # SOLIDS [1-(J/L)]*L	N EFF *	O PARTICULATE EMITTED (#) (M*(1-N))
PRIMER:															
LL.LOADER	2.9	62.8%	37.2%	7.8	4.6	9.0	150	1350	848	3,915	12.7	17,199	13,284	93.0%	930
MDL40	2.9	62.8%	37.2%	7.8	4.6	21.0	30	630	396	1,827	12.7	8,026	6,199	93.0%	434
B.LOADERS	2.9	62.8%	37.2%	7.8	4.6	4.0	150	600	377	1,740	12.7	7,644	5,904	93.0%	413
BAG CARTS	2.9	62.8%	37.2%	7.8	4.6	1.0	1,300	1300	816	3,770	12.7	16,562	12,792	93.0%	895
TRAILERS	2.9	62.8%	37.2%	7.8	4.6	1.0	1,200	1200	754	3,480	12.7	15,288	11,808	93.0%	827
UBL2	2.9	62.8%	37.2%	7.8	4.6	3.0	22	66	41	191	12.7	841	649	93.0%	45
CPT3	2.9	62.8%	37.2%	7.8	4.6	3.0	6	18	11	52	12.7	229	177	93.0%	12
FIRE TRUCKS															
EPOXY PRIMER	2.9	62.8%	37.2%	7.8	4.6	10.5	600	6,300	3,956	18,270	12.7	80,262	61,992	93.0%	4,339
SEALER PRIMER	4.5	37.4%	62.6%	7.1	11.9	1.5	600	900	337	4,005	9.3	8,379	4,374	93.0%	306
WASH PRIMER	5.4	16.6%	83.4%	6.5	32.6	1.5	600	900	150	4,878	7.4	6,651	1,773	93.0%	124
TOTAL PRIMER:								13,264	7,686	42,129		161,081	118,953		8,327
TOPCOAT:															
LL.LOADER	3.5	48.7%	51.3%	6.8	7.2	15.0	150	2250	1,096	7,875	9.0	20,318	12,443	95.5%	560
MDL40	3.5	48.7%	51.3%	6.8	7.2	27.0	30	810	394	2,835	9.0	7,314	4,479	95.5%	202
B.LOADERS	3.5	48.7%	51.3%	6.8	7.2	5.0	150	750	365	2,625	9.0	6,773	4,148	95.5%	187
BAG CARTS	3.5	48.7%	51.3%	6.8	7.2	1.0	1,300	1300	633	4,550	9.0	11,739	7,189	95.5%	324
TRAILERS	3.5	48.7%	51.3%	6.8	7.2	1.5	1,200	1800	877	6,300	9.0	16,254	9,954	95.5%	448
UBL2	3.5	48.7%	51.3%	6.8	7.2	4.0	22	88	43	308	9.0	795	487	95.5%	22
CPT3	3.5	48.7%	51.3%	6.8	7.2	6.0	6	36	18	126	9.0	325	199	95.5%	9
FIRE TRUCKS	4.3	39.0%	61.0%	6.8	10.9	14.0	600	8,400	3,276	35,712	8.3	69,384	33,672	95.5%	1,515
TOTAL TOPCOAT:								15,434	6,702	60,331		132,901	72,570		3,266
OTHER COATINGS:															
XPORT PRESERV	0.44	18.8%	81.3%	0.5	2.3	2.0	300	600	113	264	9.1	5,448	5,184	95.5%	233
TANK COATING	2.88	68.0%	36.9%	7.8	4.2	9.5	600	5,700	3,876	16,416	11.2	64,068	47,652	95.5%	2,144
UNDERCOATING	3.20	58.0%	39.5%	8.1	5.5	2.1	600	1,266	734	4,051	7.8	9,900	5,849	95.5%	263
CLEANUP SOLVENT	6.70	0.0%	100.0%	6.7	N/A			2,919	0	19,557	6.7	19,557	0	N/A	0
TOTAL OTHER COATINGS:								10,485	4,723	40,288		98,973	58,685		2,641

TOTAL VOC EMISSIONS: 142,748 LBS VOC

VOC/GAL AVE (EXCL. FIRE TRUCK TOPCOAT): 3.48 LBS VOC/GAL

TOTAL PARTICULATE EMISSIONS: 14,233 LBS

* APPLICATION EFFICIENCY: PRIMER = 30%, TOPCOAT & OTHER = 55% PARTICULATE RECOVERY EFFICIENCY = 90%

DAILY EMISSIONS (MAXIMUM PROJECTED)

COATING	A #VOC/GAL EX WATER	B %VOLUME SOLIDS	C %VOLUME SOLVENTS	D SOLVENT DENSITY (#/GAL) (A/C)	E #VOC/GAL SOLIDS (#/GAL) (A/B)	F APPL RATE (GAL/UNIT)	G QTY UNITS	H GALLONS COATINGS APPLIED (F*G)	I GALLONS SOLIDS APPLIED (B*H)	J # VOC EMITTED (E*I)	K DENSITY (#/GAL)	L TOTAL PAINT (#) (H*K)	M # SOLIDS [I-(J/L)]*L	N EFF *	O #s PARTICULATE EMITTED (M*N)
PRIMER:															
LL.LOADER	2.9	62.8%	37.2%	7.8	4.6	9.0	0.7	6.3	4.0	18.3	12.7	80.3	62.0	93.0%	4.3
MDL40	2.9	62.8%	37.2%	7.8	4.6	21.0	0.1	2.1	1.3	6.1	12.7	26.8	20.7	93.0%	1.4
B.LOADERS	2.9	62.8%	37.2%	7.8	4.6	4.0	0.6	2.4	1.5	7.0	12.7	30.6	23.6	93.0%	1.7
BAG CARTS	2.9	62.8%	37.2%	7.8	4.6	1.0	0.0	0.0	0.0	0.0	12.7	0.0	0.0	93.0%	0.0
TRAILERS	2.9	62.8%	37.2%	7.8	4.6	1.0	22.0	22.0	13.8	63.8	12.7	280.3	216.5	93.0%	15.2
UBL2	2.9	62.8%	37.2%	7.8	4.6	3.0	0.1	0.3	0.2	0.9	12.7	3.8	3.0	93.0%	0.2
CPT3	2.9	62.8%	37.2%	7.8	4.6	3.0	0.0	0.0	0.0	0.0	12.7	0.0	0.0	93.0%	0.0
FIRE TRUCKS															
EPOXY PRIMER	2.9	62.8%	37.2%	7.8	4.6	10.5	2.4	25.2	15.8	73.1	12.7	321.0	248.0	93.0%	17.4
SEALER PRIMER	4.5	37.4%	62.6%	7.1	11.9	1.5	3.0	4.5	1.7	20.0	9.3	41.9	21.9	93.0%	1.5
WASH PRIMER	5.4	16.6%	83.4%	6.5	32.6	1.5	3.0	4.5	0.7	24.4	7.4	33.3	8.9	93.0%	0.6
TOTAL PRIMER:								67.3	39.0	213.5		817.9	604.4		42.3
TOPCOAT:															
LL.LOADER	3.5	48.7%	51.3%	6.8	7.2	15.0	1	15.0	7.3	52.5	9.0	135.5	83.0	95.5%	3.7
MDL40	3.5	48.7%	51.3%	6.8	7.2	27.0	1	27.0	13.1	94.5	9.0	243.8	149.3	95.5%	6.7
B.LOADERS	3.5	48.7%	51.3%	6.8	7.2	5.0	1	5.0	2.4	17.5	9.0	45.2	27.7	95.5%	1.2
BAG CARTS	3.5	48.7%	51.3%	6.8	7.2	1.0	0	0.0	0.0	0.0	9.0	0.0	0.0	95.5%	0.0
TRAILERS	3.5	48.7%	51.3%	6.8	7.2	1.5	22	33.0	16.1	115.5	9.0	298.0	182.5	95.5%	8.2
UBL2	3.5	48.7%	51.3%	6.8	7.2	4.0	0	0.0	0.0	0.0	9.0	0.0	0.0	95.5%	0.0
CPT3	3.5	48.7%	51.3%	6.8	7.2	6.0	0	0.0	0.0	0.0	9.0	0.0	0.0	95.5%	0.0
FIRE TRUCKS	4.3	39.0%	61.0%	6.8	10.9	14.0	3	42.0	16.4	178.6	8.3	346.9	168.4	95.5%	7.6
TOTAL TOPCOAT:								122.0	55.3	458.6		1069.3	610.8		27.5
OTHER COATINGS:															
XPORT PRESERV	0.44	18.8%	81.3%	0.5	2.3	2.0	3	6.0	1.1	2.6	9.1	54.5	51.8	95.5%	2.3
TANK COATING	2.88	68.0%	36.9%	7.8	4.2	9.5	3	28.5	19.4	82.1	11.2	320.3	238.3	95.5%	10.7
UNDERCOATING	3.20	58.0%	39.5%	8.1	5.5	2.1	3	6.3	3.7	20.3	7.8	49.5	29.2	95.5%	1.3
CLEANUP SOLVENT	6.70	0.0%	100.0%	6.7	N/A	N/A	N/A	17.5	0.0	117.3	6.7	117.3	0.0	N/A	0.0
TOTAL OTHER COATINGS:								58.3	24.2	222.3		541.7	319.3		14.4

TOTAL VOC EMISSIONS: 894 LBS VOC

VOC/GAL AVE (EXCL. FIRE TRUCK TOPCOAT): 3.48 LBS VOC/GAL

TOTAL PARTICULATE EMISSIONS: 84.2 LBS

* APPLICATION EFFICIENCY: PRIMER = 30%, TOPCOAT & OTHER = 55% PARTICULATE RECOVERY EFFICIENCY = 90%

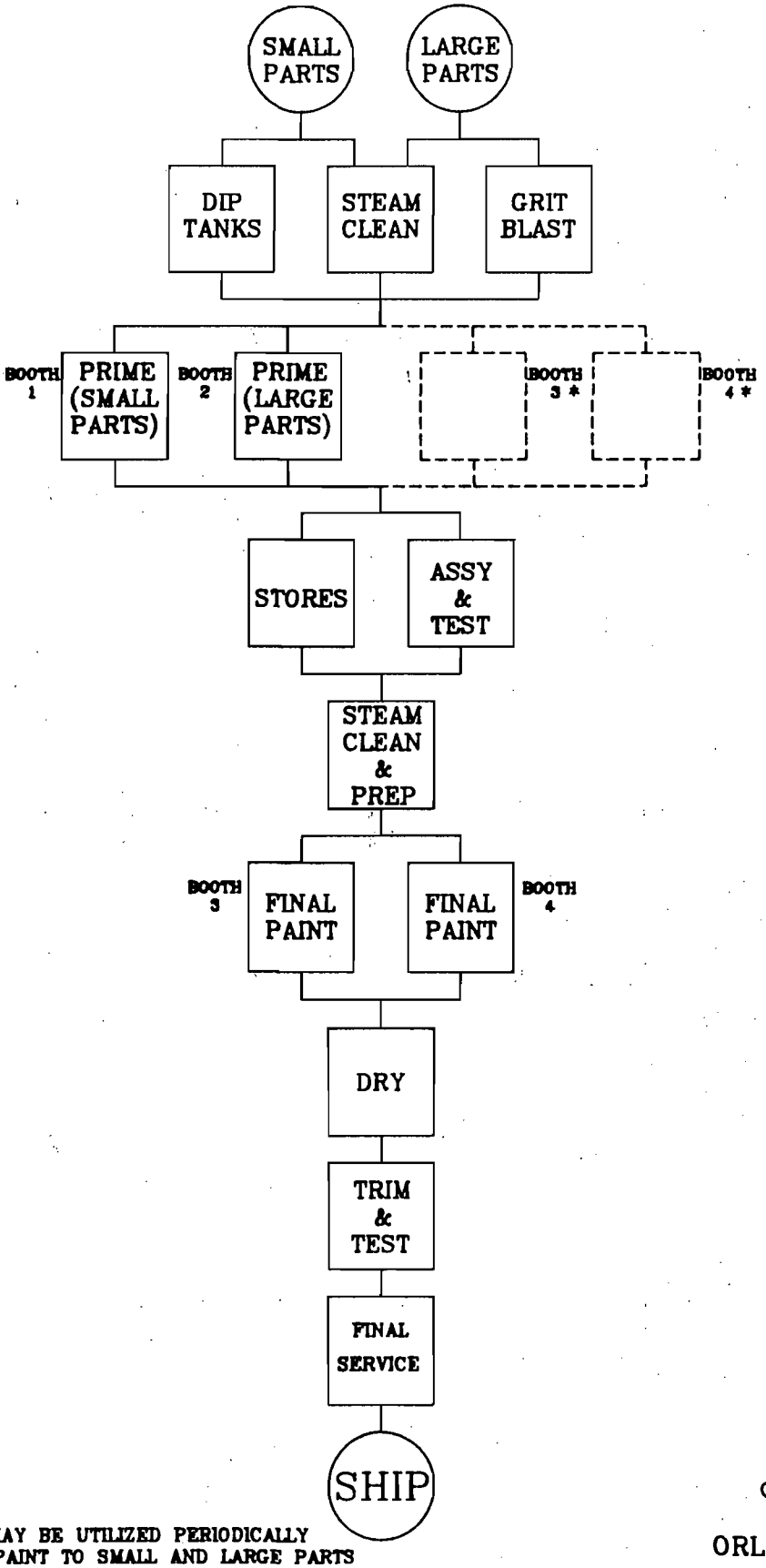
SAMPLE CALCULATIONS

ANNUAL - PRIMER - LL.LOADER:

"D".	SOLVENT DENSITY	= (#VOC/GAL)/(%VOLUME SOLVENTS) =	= (2.90) / (.372) = 7.8 #/GAL
"E".	#VOC/GAL SOLIDS	= (#VOC/GAL)/(%VOLUME SOLIDS)	= (2.90) / (.628) = 4.617 #/GAL
"H"	GAL COATING APPLIED	= (APPL RATE)*(QTY UNITS)	= (9.0) * (150) = 1,350 GAL
"I"	GAL SOLIDS APPLIED	= (%VOLUME SOLIDS)*(GAL COATING)	= (.628) * (1,350) = 848 GAL
"J"	# VOC EMITTED	= (#VOC/GAL SOLIDS)*(GAL SOLIDS)	= (4.617) * (848) = 3,915 # VOC
"L"	TOTAL PAINT	= (GAL COATING)*(DENSITY)	= (1,350) * (12.74) = 17,199 GAL
"M"	# SOLIDS APPLIED	= [1-(#VOC EMITTED)/(TOTAL PAINT)]*(TOTAL PAINT)	= [1 - (3,915)/(17,199)] * (17,199)
			= 13,284 # SOLIDS APPLIED
"N"	EFF. (EFFICIENCY)	= 1-[(1-T.E.)*(1-BOOTH EFF)]	= 1 - [(1-0.3) * (1-0.9)] = 93.0%
"O"	#s PARTICULATE EMITTED	= (# SOLIDS APPLIED)*(1-EFF.)	= (13,284) * (1-0.93) = 930 # PARTICULATE

PROCESS FLOW DIAGRAM

PROPOSED VEHICLE PRODUCTION/FINISHING LINE



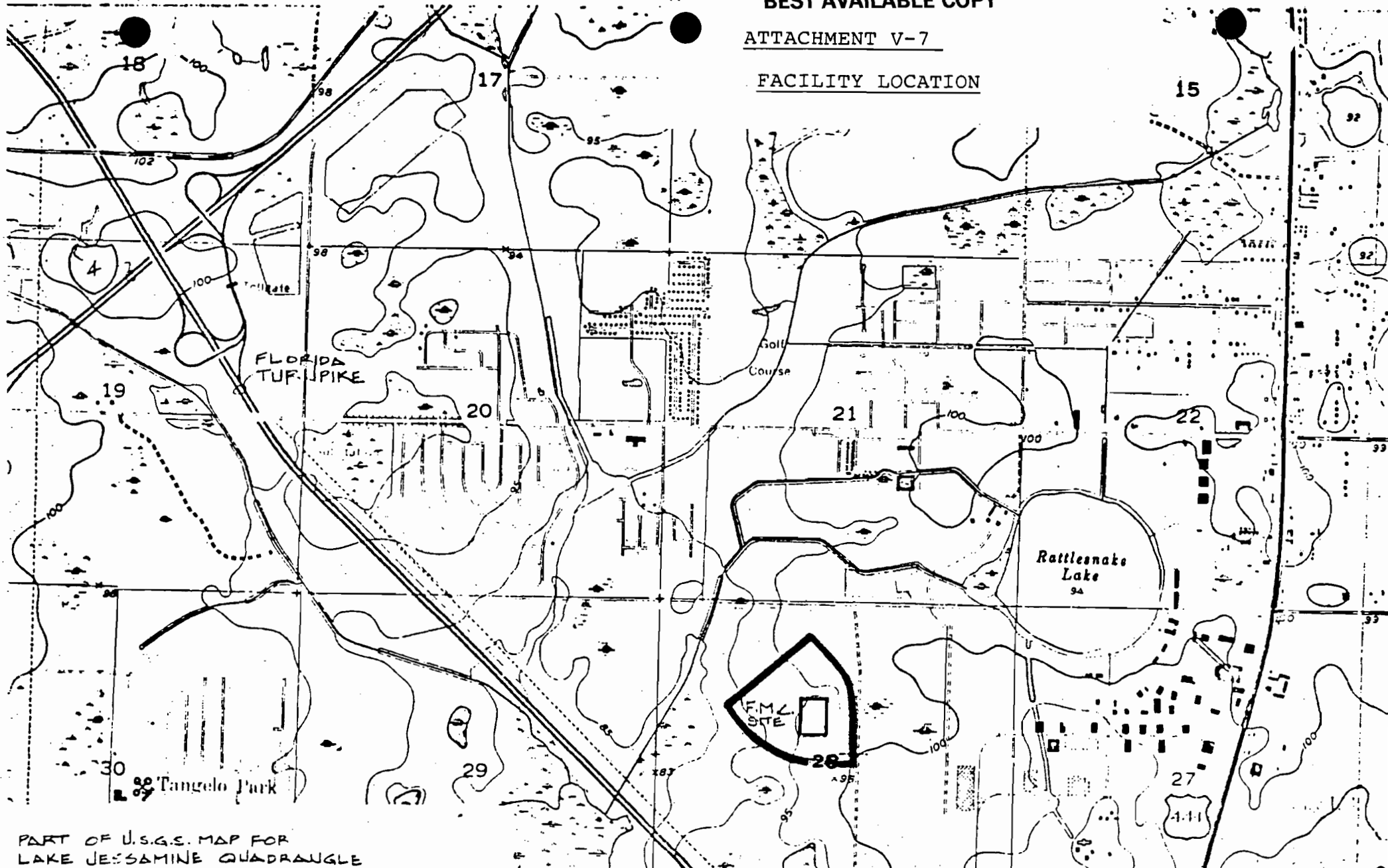
* BOOTH 3 AND 4 MAY BE UTILIZED PERIODICALLY TO APPLY PRIME PAINT TO SMALL AND LARGE PARTS

FMC

ORLANDO, FLORIDA

ATTACHMENT V-7

FACILITY LOCATION

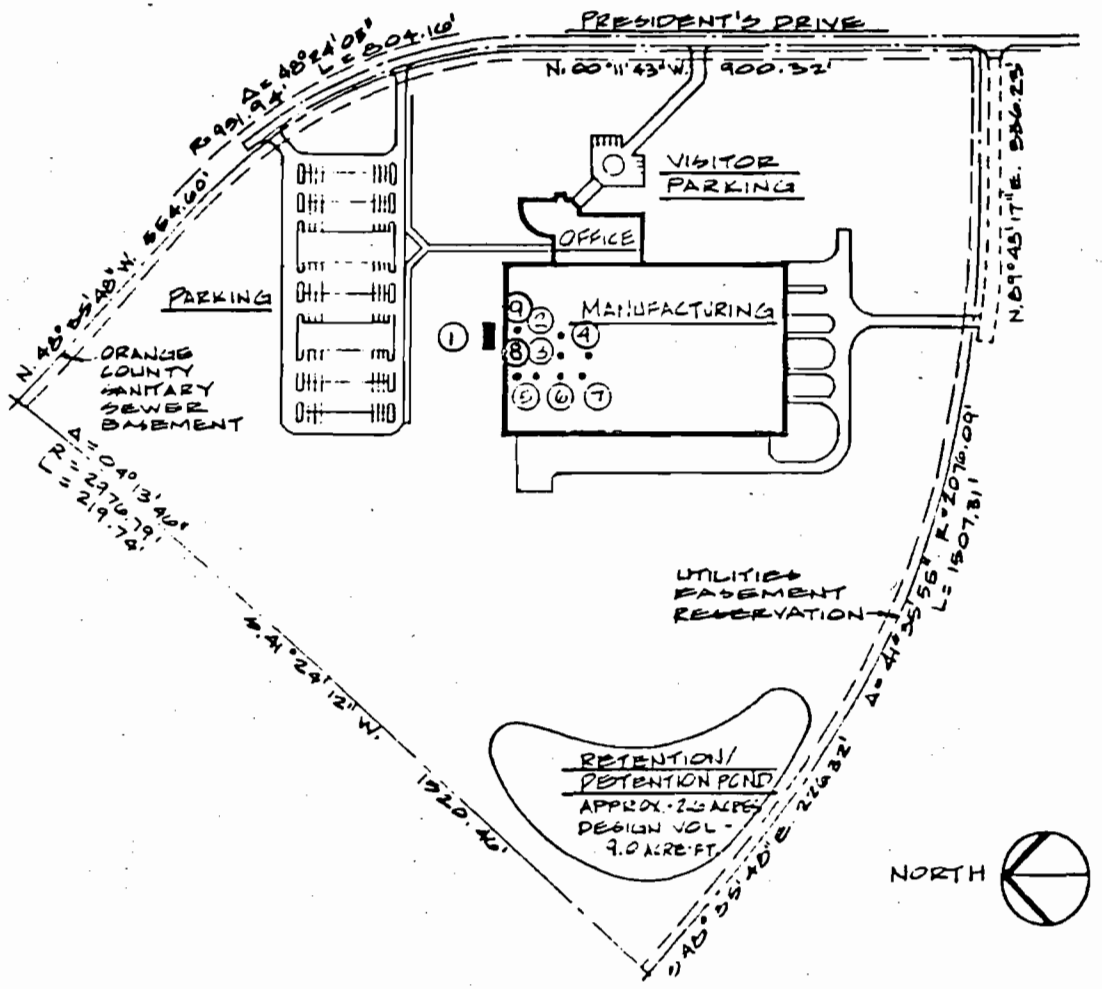


PART OF U.S.G.S. MAP FOR
LAKE JESSAMINE QUADRANGLE

ELUG/NABYABRT/GENHEIMER ASSOC. CONSULTANTS
LIN SMITH, F.A.I.A. - ROGER NABYABRT, P.E.
3290 W. BIG BEAVER, TROY, MICHIGAN 48084
313-649-2000, JOB NO. 81-151, 9/25/81

ATTACHMENT V-8

PLOT PLAN



FMC CORPORATION

AIRLINE EQUIPMENT DIVISION
EASTERN FACILITY ORLANDO, FLORIDA

LEGEND

1. UNDERGROUND TANKS
   - 1 - 2000 GAL. GASOLINE
   - 1 - 2000 GAL. DIESEL FUEL
   - 2 - 2000 GAL. HYDRAULIC OIL
   - 1 - 2000 GAL. WASTE OIL
2. PRIME PAINT SPRAY BOOTH EXHAUST
3. PHOSPHATE LINE EXHAUSTS
4. PRIME PAINT DRYING OVEN EXHAUST
5. FINAL PAINT SPRAY BOOTH EXHAUSTS
6. PRIME PAINT SPRAY BOOTH EXHAUSTS
7. GRIT BLAST BOOTH EXHAUST
8. FINAL PAINT SPRAY BOOTH EXHAUST
9. PAINT DRYING OVEN EXHAUST

SITE PLAN

NO SCALE

ELLIS/NAEYAERT/GENHEIMER ASSOC. CONSULTANTS
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