



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

February 21, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael Stickles, Plant Manager
Merillat Corporation
1300 Southwest 38th Avenue
Ocala, Florida 34474

Re: Second Request for Additional Information
Ocala Facility Expansion Project
File Nos. 0830137-003-AC (PSD-FL-347), 0830137-004-AV

Dear Mr. Stickles:

The Department is in receipt of your Response to Request for Additional Information dated January 18, 2005. While the bulk of our requests were more than adequately addressed, some further clarifications are needed. Also, based on recent discussions with Merillat and the prospect of different control strategies, additional information is required. In order to continue processing the application, we will need the information below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

The specific requests for additional information are set forth as follow:

Cost effectiveness for a regenerative thermal oxidizer and one vendor quote was supplied in the recent response to the Department's request for at least 2 vendor quotes and cost analysis. The requested cost for a concentrator with oxidizer based on a current vendor quote was not supplied. On February 17th representatives from the Bureau of Air Regulation met with representatives from Merillat and Durr to discuss control options including a combination of concentrator and RTO, and the prospect of controlling only those areas of each line where VOC concentrations are highest.

- 1) Describe in detail the amount of VOC emissions from each area of the finishing lines. Based on the facility walkthrough recently conducted by DURR, discuss which area/s would be most effective to control based on quantity of emissions from each area, and cost for each.
- 2) Provide a cost estimate for a combination of concentrator and RTO designed to maintain VOC emissions below the PSD-major facility threshold of 250 tons per year.

Provide details from the vendor regarding the suitability of a concentrator for this facility. If the vendor does not recommend a concentrator for this specific application, the vendor must identify each potential problem that would adversely impact this control option (i.e., elevated inlet temperatures, high inlet humidity, the formation of fine particulates in the form of silicon and titanium oxides, etc.). Provide sufficient details to support each claim such as: temperature/humidity performance curves; a list of coatings/solvents that contain the constituents capable of forming the fine particulate; the chemical reaction and condition leading to the formation of this particulate; an estimate of the

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particulate formation rate given the chemical species and usage rates at Merillat; and an estimate of the expected particulate size range. Describe the affects of the fine particulate on the concentrator and the RTO. Describe any differences in impacts for carbon and zeolite concentrators. Provide typical humidity levels and ambient temperature readings for the Ocala facility for different times of the year.

Is it possible to periodically wash the concentrator? What would be the frequency and downtime associated with washing? How would this impact the concentrator replacement frequency?

Has the vendor supplied any concentrators for the wood surface coating industry? Please provide contact information.

The vendor should also provide any actual case studies where a concentrator was used in a similar finishing operation (i.e., automotive) where such fine particulate was formed and caused adverse problems. Describe the operation, associated problems, levels of chemical species causing the formation of the particulate, and the actions taken to correct the problems.

As a separate line item, provide a cost estimate for a particulate control device to remove the fine particulate.

- 3) Provide a cost estimate for an RTO designed to control all four coating lines.
- 4) Provide a cost estimate for controlling only the proposed fourth line with an RTO. This scenario should include re-designed application booths that would re-circulate a portion of the booth air to increase VOC concentrations and reduce flows to the RTO.
- 5) For each of the above cost estimates identify:
 - Destruction efficiency across the RTO should be at least 98%, preferably 99%, but optimized for costs.
 - Capture efficiency and operational areas identified for control may be selected as necessary to optimize costs.
 - Provide line item estimates for ductwork, foundations and other structural support items.
 - Provide an estimate of the costs for modifying the existing spray booths to lower exhaust flow and increase VOC concentration in the exhaust delivered to the RTO. Describe the modifications.
 - Provide an estimate of the costs for new spray booths designed to lower exhaust flow and increase VOC concentration in the exhaust delivered to the RTO.
 - For all cost estimates, please use current prices for natural gas and electricity available to Merillat in Ocala. Provide supporting information.
- 6) Describe the method used to determine the LEL for the gas mixture in each spray booth. What is the actual concentration in each booth and how is this calculated? Provide specifications used by Merillat for maximum allowable concentrations inside manual spray booths. What is the minimum flow needed to maintain this level?
- 7) Discuss the feasibility and appropriateness of natural gas injection to lower operating costs for the RTO.
- 8) Identify and describe each existing wood coating operation affiliated with Masco that employs add-on controls (i.e., RTO, etc.) to reduce VOC/HAP emissions. Describe the controls used and identify the vendor. Estimate the controlled and uncontrolled VOC emissions from each such facility. Identify the maximum and actual cabinet production capacity. Describe the problems associated with the

Mr. Michael Stickles
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formation of fine silicon and titanium oxides particulate. What are the procedures used to mitigate this problem.

- 9) Provide a recommendation from Durr regarding the appropriate control technology for the wood coating lines at the Merillat facility. If this is different from any of the above scenarios, provide a cost estimate.
- 10) Identify alternative solvents and coatings that could be implemented to reduce VOC emissions.
- 11) In the first request for additional information, an ambient air quality analysis was requested for ozone for the Class I and Class II areas. Impacts on soils and vegetation were addressed in the response dated Jan. 18, 2005. However, will the VOC emissions affect a Class I area? Also in the response, it states that the "increase in VOC emissions associated with the project is not expected to result in an increase in ozone levels for the Ocala area." Please explain further how this conclusion was made. Was ambient air quality modeling involved in this conclusion? This conclusion is for the Ocala area and ozone is a regional pollutant. Can this conclusion be made for surrounding areas as well?
- 12) To satisfy Rule 62-212.400(3)(h)(5), the response dated Jan 18th states that Ocala, Marion County has seen "moderate growth." How was this determined? Has there been any growth in the vicinity of the existing Merillat facility? If so, what kind of growth. Commercial, Residential?

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1), F.A.C., "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department ... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

If you have any questions, please call Cindy Mulkey at 850/921-8968.

Sincerely,



Jeff Koerner, P.E.
Air Permitting South Section

Cc: Len Kozlov, DEP
Jim Little, EPA Region 4
John Bunyak, National Park Service
Donna Tackett, Merillat - Ocala
Joel Cohn, P.E., Malcolm Pirnie
David Cibik, P.E., Malcolm Pirnie

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1. Article Addressed to:

Mr. Michael Stickles, Plant Manager
 Merillat Corporation
 1300 Southwest 38th Avenue
 Ocala, Florida 34474

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 1300 Southwest 38th Avenue
 City: Ocala, Florida 34474

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