

Department of Environmental Protection

Governor Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs Secretary

TO: Victor Hunburt, P.E.	DATE: 6/10/99
DEPT: Malcolm Pirnie, Inc. FAX#:	(407) 660 - 9550
Number of Pages: (including cover page)	
FROM: Johnny Edwards	
PROGRAM: <u>AIR RESOURCES MGMT</u> SECTION	Permitting
TELEPHONE # 407-893-3333, 3334 SC 325-3333, 3334	FAX #: 407-897-5963 SC 342-5963
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COMMENTS:	



Department of **Environmental Protection**

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Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767

David B. Struhs Secretary

AIR RESOURCES COMPLETENESS REVIEW

SOURCE NAME: Merillat Corporation

DATE RECEIVED: 06/07/99

APPLICANT:

John D. Thurman,

DATE REVIEWED: 06/09/99

V.P.-Finance and Treasurer

ADDRESS:

Merillat Corporation

FILE: 0830137-001-AC

5353 West U.S. 223 Adrian, MI 49221

Your response to the Department's completeness review letter dated May 28, 1999 has been received and reviewed for completeness. The following items are needed to complete your application, and the item numbers correspond to the item numbers in the aforementioned Department letter.

DEP Form No. 62-210.900(1) remains incomplete. The facility location and coordinates (UTM or Lat/Long) have not been provided on pages 1 and The appropriate box was not checked for the 7, respectively. professional engineer's certification on page 4, therefore the engineering features described in the application have not been certified. Rule 62-4.050(3), Florida Administrative Code (F.A.C.), states:

> To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution, or of a public drinking water supply, shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S.; ... All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a non-Title V source as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

Please complete these pages and submit for Department review.

2. This item remains incomplete. Rule 62-4.050(2), F.A.C., requires that all applications and supporting documents shall be filed in quadruplicate with the Department. Please provide three additional copies of the subject permit application.

John D. Thurman Completeness Review - 0830137-001-AC Page 2

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> 3. New sources are required by 63.804(d), Title 40 - Code of Federal Regulations (CFR), to meet the emission limits described 40CFR63.802(b) by (1) average VHAP calculations, (2) using complaint materials, (3) using control systems, or (4) any combination of (1) through (3). The subject response states, "Compliance with the emission limits pertaining to the finishing operations will be achieved either on a weighted average VHAP content basis or by using compliant materials. Merillat will comply with the emission limits for contact adhesives and cleaning materials by using compliant materials" However, Table 1 of the same response indicates that control devices may be used as an alternative for finishing operations and contact adhesives. clarify whether the applicant intends to use control devices to comply with the emission limits. Additionally, please provide a list of compliant materials (finishing operations and contact adhesives) and average VHAP calculations for finishing operations from one of your currently operating facilities subject to 40 CFR Part 63 Subpart JJ.

40CFR63.804(g)(3) requires a compliance demonstration for continuous coaters by following the procedures described in paragraph (i) or (ii). Please indicate which compliance method will be used at the proposed facility and provide a sample compliance certification from one of your currently operating facilities subject to this requirement.

Pursuant to Rule 62-4.055, F.A.C., the applicant shall have 90 days after the Department mails a timely request for additional information to submit that information to the Department. If an applicant requires more than ninety days in which to respond to a request for additional information, the applicant may notify the Department in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to 90 days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information shall constitute good cause. Failure of an applicant to provide the timely requested information by the applicable deadline shall result in denial of the application.

If you have any questions, please fax me at 407/897-5963 or write to me at the above address.

Sincerely,

Alan Zahm, P.E.

Permitting Supervisor

10 June 99

AZ/wje

Cc: Jim Olszewski, Manager of Facilities, Engineering & Environmental Svcs.
Victor A. Hurlburt, P.E. - Malcolm Pirnie, Inc.
Joel S. Cohn, P.E. - Malcolm Pirnie, Inc.

L.T. Kozlov, P.E. - Air Resources Program Administrator, FDEP - OCD

Victor Hurlburt, P.E. (407) 660-1133 (407) 660-9550