



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

TO: Victor Hurlbert, P.E. DATE: 6/10/99

DEPT: Malcolm Pirnie, Inc. FAX#: (407) 660-9550

Number of Pages: 3 (including cover page)

FROM: Johnny Edwards

PROGRAM: AIR RESOURCES MGMT SECTION Permitting

TELEPHONE # 407-893-3333, 3334
SC 325-3333, 3334

FAX #: 407-897-5963
SC 342-5963

COMMENTS:

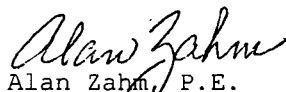
3. New sources are required by 63.804(d), Title 40 - Code of Federal Regulations (CFR), to meet the emission limits described in 40CFR63.802(b) by (1) average VHAP calculations, (2) using complaint materials, (3) using control systems, or (4) any combination of (1) through (3). The subject response states, "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. Please 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 Zahn, P.E.
Permitting Supervisor

10 June '99
Date

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.

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