

June 30, 1999

Mr. Johnny Edwards  
Florida Department of Environmental Protection  
Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767



Re: Merillat Corporation Permit Application  
File 0830137-001-AC

Dear Mr. Edwards:

In response to the Florida Department of Environmental Protection's completeness review letter dated June 29, 1999, regarding Merillat Corporation's permit application we are providing the following information:

1. Merillat will comply with the emission limits for finishing operations prescribed under 40 CFR 63, Subpart JJ on a weighted average VHAP content basis across all coatings. Please disregard all previous indications that suggest that a compliant material basis will be used. Since a compliant finishing material basis will not be used, we are not providing an example table that categorizes each type (sealers, stains, topcoats, etc.) of finishing material.
2. An example table from an existing Merillat facility pertaining to the use of contact adhesives is not available, as these materials are not typically used at other Merillat facilities. However, only compliant contact adhesives (maximum VHAP content of 0.2 lb VHAP/lb solids) will be used by Merillat at the proposed Ocala facility in accordance with 40 CFR 63, Subpart JJ.
3. The energy source for the burners associated with the curing ovens will be natural gas. The burners will have a total maximum heat input capacity of 5 MMBtu/hour. Estimates of potential hourly and annual emissions from the combustion of natural gas in the burners are attached. The estimates are based on emission factors from the Environmental Protection Agency's Compilation of Air Pollutant Emission Factors (AP-42).

We trust that the information provided addresses the items identified in the DEP's completeness review letter. If you have any questions or concerns regarding the enclosed, please contact me at (757) 873-4411.

Sincerely,

MALCOLM PIRNIE, INC.

Handwritten signature of Joel S. Cohn in blue ink.

Joel S. Cohn, P.E.  
Project Engineer

kmr  
2767-014

Enclosure

c: Jim Olszewski, Merillat Industries (w/enclosure)

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**Estimated Potential Emissions from Natural Gas Burners (Curing Ovens)  
Merillat Corporation - Proposed Ocala Facility**

Pollutant	Emission Factor (lb/10 <sup>6</sup> ft <sup>3</sup> )	Estimated Potential Emissions	
		(lb/hr)	(tons/yr)
NO <sub>x</sub>	100	0.50	2.19
CO	84	0.42	1.84
PM	7.6	0.04	0.17
SO <sub>2</sub>	0.6	0.003	0.01
VOC	5.5	0.03	0.12

**Notes:**

- 1) Emission estimates based on total (combined) burner capacity of 5 MMBtu/hr
- 2) Emission factors obtained from Tables 1.4-1 and 1.4-2 of AP-42 (dated 07/98)
- 3) Example calculation:  

$$\text{NO}_x = 5 \text{ MMBtu/hr} \times 100 \text{ lb}/10^6 \text{ ft}^3 \times \text{ft}^3/1000 \text{ Btu} \times 10^6 \text{ Btu/MMBtu} = 0.50 \text{ lb/hr}$$

$$\text{NO}_x = 0.50 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times \text{ton}/2,000 \text{ lb} = 2.19 \text{ tons/yr}$$