

U.S. ENVIRONMENTAL PROTECTION AGENCY
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Memo

*Allow
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To: Cindy Mulkey, Florida Department of Environmental Protection (FDEP)

From: Jim Little, Air Permits Section (404-562-9118)

Subj: Merillat Prevention of Significant Deterioration (PSD) Permit Application

Date: December 10, 2004

0830137-003-AC

We have reviewed the PSD permit application dated October 2004 for an expansion of the Merillat Corporation wood furniture manufacturing facility in Ocala, Florida. The proposed expansion triggers PSD review for volatile organic compounds (VOC).

Our comments on the application were discussed with you by telephone on December 9, 2004, and are summarized below. Most of our comments pertain to the applicant's best available control technology (BACT) evaluation. Our comments are similar in many respects to the comments made by FDEP in a letter to Merillat dated November 8, 2004.

1. The only source of comparison information cited in the applicant's BACT evaluation is EPA's RACT/BACT/LAER Clearinghouse (RBLC). Although the RBLC is a good starting point, sources of comparison data should not be restricted to the RBLC. If the applicant is aware of any other relevant facilities not listed in the RBLC, the VOC control technologies in use at these facilities should be described
2. Without more specific information to the contrary, the project appears to include a relaxation of a previous emissions limit taken to avoid PSD review. A "relaxation" requires treatment of the affected emissions units as though they had never been constructed. Consistent with this concept, we believe the total proposed potential VOC emissions for the entire facility (411 tons per year) should be used when calculating tons reduced for BACT cost effectiveness (dollars per ton) estimation purposes. For example, if a control option can achieve a 90 percent overall capture and destruction efficiency, then the VOC tons reduced would be 0.90 times total VOC emissions and not 0.90 times the difference between total VOC emissions and the previous allowable emissions. With this approach, the cost effectiveness value for the regenerative thermal oxidation control option is much more reasonable.