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February 23, 2006

Alan Zahm, P.E.  
Permitting Supervisor  
Department Of Environmental Protection  
Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767

Subject: Air Resources Completeness Review of February 16, 2006  
Merillat Corporation LP  
1300 SW 38<sup>th</sup> Avenue  
Ocala, FL 34474  
File : 0830137-005-AV

Dear Mr. Zahm;

This letter is in response to the Title V permit renewal application Completeness Review received on February 16, 2006. In your correspondence you indicated two items required completion prior to the application being deemed complete. The following discussion should address these areas of concern:

Item #1

The Completeness Review indicates that if documentation showing compliance with the construction permit for Line # 4 could not be provided within 90 days, then the Title V permit renewal application should be modified to exclude Line #4. It should be noted, and as you observed at the time of your visit, that Line #4 is still under construction and is to be placed in operation by April 1, 2006. Upon completion of installation and start-up, all permit conditions will be met. These conditions do not include a compliance test for Line #4 (contrary to what was indicated in the Completeness Review). Material usage tracking and associated recordkeeping will be performed in the same manner as that already established and performed for Lines #1-#3.

Therefore, because installation of Line #4 is scheduled to be complete by April 1 (within 90 days), and compliance will be established upon start-up, the Title V permit renewal

application should include incorporation of Line #4's construction permit requirements and modification of the application is not warranted.

Item #2

The Completeness Review seeks clarification as to why the total amount of chemicals reported on EPA's Toxic Release Inventory (TRI) in 2003 does not match (or come close to) the total tons of VOC emissions tracked for the year 2005. In response, I offer the following explanation: The TRI Release report is strictly used to report any chemical listed on the EPCRA Toxic chemicals list that is processed or used by the facility in quantities above the threshold limits set by the US EPA. (Please see [www.epa.gov](http://www.epa.gov) for further explanation). Or, in other words, only those chemicals that the facility uses 10,000 or more pounds of are reported on the TRI. There are many chemicals that the facility uses (and tracks towards total VOC emissions) that are not required to be reported on the TRI because 10,000 pounds of that chemical were not used during that year. Therefore, it would make sense, and is quite appropriate, that the total emissions of chemicals reported on the TRI would not match the total VOC emissions from the facility.

Hopefully this will provide you with the information that you requested and allow you to proceed with the processing of our Title V permit renewal.

Please feel free to contact me at 352-291-4623 or Donna Tackett at 352-291-4622

Sincerely,

A handwritten signature in black ink, appearing to read "Chadwick Miller". The signature is stylized with a large, circular flourish at the end.

Chadwick Miller  
Plant Manager  
Merillat LP  
Ocala Plant