

JOEL
LORRY



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 17, 2008

**RE: Jackson
Merillat Industries
0640010020
NON-HPV Notice of Violation
Correspondence**

Certified: 70063450000190560853

Mr. John D. Lewis
Merillat Corporation
960 East Main Street
Jackson, Ohio 45640

Dear Mr. Lewis:

As a result of the 2004 Title V (TV) facility air compliance inspection, Ohio EPA-SEDO sent a certified letter dated September 7, 2004 requesting a permit to install application for emission unit P005. Files reviewed for Merillat's recent 2008 TV inspection revealed that the PTI application requested for emission unit P005, Wood Working System, has yet to be submitted. Documents indicate P005 was installed in August of 1977 and placed on registration status. Despite this, we believe a PTI should have been obtained for P005 and we are now requesting Merillat submit the appropriate PTI applications and Emission Activity Category forms (EAC) to obtain a PTI for P005 to rectify this oversight.

Additionally, a letter in Merillat's file dated December 14, 1984, notes that emission units P002, P003 and P004 (predry kilns and kilns) did not require a permit, however, there aren't any emission calculations or emissions information to support that decision. We ask that Merillat provide Potential to Emit (PTE) data/calculations (with EAC forms) for emission units P002, P003 and P004 and (re)-evaluate the permit liability for emissions units P002, P003 and P004.

The application forms and instructions are available on Ohio EPA's world wide web site at the following address:

<http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>

The last item is regarding a Compliance Assurance Monitoring (CAM) Plan, 40 CFR Part 64, see

http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=643ff9d6567bc0b8e02b4ca98e3a3d5c&tpl=/ecfrbrowse/Title40/40cfr64_main_02.tpl

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Additional useful CAM reference materials can be read at the following links:

<http://www.epa.state.oh.us/dapc/starship/Winter2006.pdf>

<http://www.epa.gov/ttn/emc/cam/camfaq1r1004.pdf>

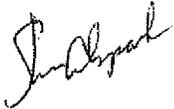
<http://www.nocawma.org/documents/ahtvp.pdf>

Unless a facility is not subject to the CAM rule, a CAM Plan should have been submitted when the TV renewal permit application was submitted, if not required sooner per the CAM rule. Merillat needs to state if CAM is applicable to Merillat's Jackson facility, and indicate when the CAM plan will be submitted or explain why Merillat-Jackson is not subject to CAM.

Merillat must respond to the above items within 30 days of receipt of this letter. The response must include a schedule for subsequent submittals as needed (eg. PTI apps, PTE calcs, CAM plan, revised/updated TV application including CAM rule citation).

If you have any questions regarding this matter, please contact me at (740) 380-5424.

Sincerely,



Steve Alspach
Environmental Specialist II
Division of Air Pollution Control

SA/mlm