

November 20, 2008

Ohio Environmental Protection Agency
Division of Air Pollution Control
Permit Management Unit
P. O. Box 1049
Columbus, Ohio 43216-1049

Re: Modifications to Title V Permit Application
Merillat Corporation - Loudonville, Holmes County, Ohio
EPA I.D. # 02-38-00-0136

Dear Sir or Madam:

Enclosed is the revised application of Merillat Corporation for an operating permit (Title V permit) as required by Chapter 3745-77 of the Ohio Administrative Code (OAC). The Northwest District Office has requested that we modify and update our Title V Permit Application to reflect the changes to our facility since our first Title V Permit Application was submitted on February 23, 1996. Discussed below are a number of key points related to the development of this application.

The original Title V Permit Application submittal was filename Merillat.p06, BBS receipt verification number #0000000783, and was submitted on 02/23/96.

Corrections/Revisions to the Title V Permit Application

The changes made for this submittal of our Title V operating permit applications and the forms on which the corrections or revisions occur are as follows:

1. We have made an administrative correction to the name of our facility, Merillat Corp. - Loudonville, to be consistent with our state permits (see Maintain Entities).
2. The current plant manager and responsible official is Andrew J. Verkamp (see Facility Information).
3. As requested by the NWDO, we have added emission source, P002, to our Title V Permit application. With this new source we added two control devices (P002-Collector "C" -Baghouse, and P002-Collector "C" - Cyclone) and one egress point (BagEx-Col-C) to our permit application (see Maintain Entities, Facility Information, Emission Unit form for P002, and EAC form for P002).
4. We corrected a typing error (administrative change) to the P001 Emission rate determination basis (for units of applicable requirement(s)). It improperly read "As required by OAC 3745-21-11 (B)(2)..." and was corrected to "As required by OAC 3745-17-11 (B)(2)..." No emission limits were affected. (see Emission Unit form for P001).

5. Under item #10 (Estimated Emissions) of the facility-level information section of the application, the actual VOC and particulate matter emissions for the applicable sources were updated to reflect the current emission of the facility.
6. Emission unit K006 received a PTI but was never installed at the facility. The emission unit information has been removed from this Title V permit application. (see Maintain Entities and Facility Information.).
7. An administrative change was made to the description of emission unit K007 in Maintain Entities. The wording “toner/sealer” was changed to “toner/stain”. (see Maintain Entities)
8. The normal operating schedule for emission sources P001 and Z002 have been updated to reflect potential operating hours of 8760 hours/year.

We are currently in the process of submitting a PTI modification for our facility, concerning emission sources K001, K004, K005, and K007. Changes have been made to the Emission Unit forms and the EAC forms in this revised Title V permit application for each of these emission sources to reflect this PTI modification.

To the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this application are accurate based on reasonable estimates using data available to me in preparing this application. I wish to emphasize that every effort has been made to provide a complete and accurate application. We are relying on the accuracy of the STARShip software program and the interpretation of the information provided. Potential problems within the STARShip program encountered have been associated with the printing of a complete hard copy of the application. The printed format leaves out all or part of certain information included in the electronic forms. Merillat is available and willing to cooperate where necessary to ensure that this application continues to contain all necessary information.

If you should have any questions, please feel free to contact me at (419) 994-5571.

Sincerely,

Kent E. Field
Environmental/Safety Engineer

tvletter.wpd

Enclosure