



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

9/26/2013

Certified Mail

STEPHEN LEATHER  
HERITAGE MARBLE OF OHIO INC  
7086 HUNTLEY RD  
COLUMBUS, OH 43229

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125251039  
Permit Number: P0007407  
Permit Type: Renewal  
County: Franklin

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
HERITAGE MARBLE OF OHIO INC**

Facility ID:	0125251039
Permit Number:	P0007407
Permit Type:	Renewal
Issued:	9/26/2013
Effective:	9/26/2013
Expiration:	9/26/2018





**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
HERITAGE MARBLE OF OHIO INC**

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do? .....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them? .....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?.....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator? .....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?.....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. P005, POT WASHER .....	11
2. R001, MOULD GEL COATING .....	16
3. Emissions Unit Group -Mixers and layup: P002,P003,P004, .....	24





## Authorization

Facility ID: 0125251039  
Application Number(s): A0047402  
Permit Number: P0007407  
Permit Description: FEPTIO Renewal permit for Polystyrene Marble Matrix Mixer, Hand lay up area, Hobart mixer, pot washer, mould spray coating booth  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 9/26/2013  
Effective Date: 9/26/2013  
Expiration Date: 9/26/2018  
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

HERITAGE MARBLE OF OHIO INC  
7086 HUNTLEY RD  
Worthington, OH 43085

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

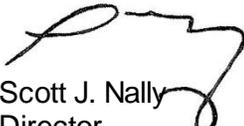
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0007407  
 Permit Description: FEPTIO Renewal permit for Polystyrene Marble Matrix Mixer, Hand lay up area, Hobart mixer, pot washer, mould spray coating booth

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID: P005**  
 Company Equipment ID: POT WASHER  
 Superseded Permit Number: P0007408  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: R001**  
 Company Equipment ID: MOULD GEL COATING  
 Superseded Permit Number: 01-5229  
 General Permit Category and Type: Not Applicable

**Group Name: Mixers and layup**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	casting area
Superseded Permit Number:	01-5229
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	A.J.I.S.
Superseded Permit Number:	01-5229
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Hobart mixer
Superseded Permit Number:	01-5229
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
HERITAGE MARBLE OF OHIO INC  
**Permit Number:** P0007407  
**Facility ID:** 0125251039  
**Effective Date:** 9/26/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

---

<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
HERITAGE MARBLE OF OHIO INC  
**Permit Number:** P0007407  
**Facility ID:** 0125251039  
**Effective Date:** 9/26/2013

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
HERITAGE MARBLE OF OHIO INC  
**Permit Number:** P0007407  
**Facility ID:** 0125251039  
**Effective Date:** 9/26/2013

## **C. Emissions Unit Terms and Conditions**



1. P005, POT WASHER

**Operations, Property and/or Equipment Description:**

Enclosed solvent washer for Hobart Mixer pots.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 01-3685 issued 4/28/1993)	Emissions shall not exceed:  1.0 pound per hour volatile organic compounds (VOC)  4.4 tons per year VOC
b.	OAC rule 3745-21-09(O)	See b)(2)a., c)(1), d)(1) and d)(2), e)(3)
c.	OAC rule 3745-21-25(D)(1)	See b)(2)c., f)(1)b.

(2) Additional Terms and Conditions

a. The cold cleaner shall be operated with a cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit, or if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand. The cover shall remain closed at all times, except when parts are being handled or solvent is being added or removed.



- b. The cold cleaner shall be equipped with a device for draining the cleaned parts.
- c. The following work practice standards from table 1 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

\* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.



c) Operational Restrictions

- (1) The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. A permanent, legible, conspicuous label, summarizing the operating requirements shall be maintained near or attached to the cold cleaner.
  - b. Waste solvent shall be stored in covered containers.
  - c. The cover shall remain closed whenever parts are not being handled in the cleaner.
  - d. Cleaned parts shall drain until dripping ceases.
  - e. If used, a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) shall be supplied at a pressure that does not exceed 10 pounds per square inch gauge.
  - f. Porous and/or absorbent materials shall not be cleaned in the cold cleaner.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information:
  - a. the types of solvents employed in the cold cleaner, including the chemical name(s) and concentration;
  - b. the vapor pressure of each solvent applied, in pound per square inch absolute, measured at 100 degrees Fahrenheit; and
  - c. the maximum temperature at which the solvent is maintained, if not maintained at room temperatures.

The records for the types of solvents employed during each year and the vapor pressure of each solvent at 100 degrees Fahrenheit shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain records of the following information, collected at the end of each year:
  - a. the total cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year;
  - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and
  - c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.



- (3) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards for OAC rule 3745-21-25 in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O), and 3745-21-25(P).

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly reports documenting any period of time during which a solvent with a vapor pressure greater than 0.6 lb/in<sup>2</sup> absolute measured at 100EF was used or the solvent was heated above 120EF (without the meeting the control requirements of OAC rule 3745-21-09(O)(2)(c); and any period of time during which the cold cleaner was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.0 pound VOC per hour and 4.4 tons per year

Applicable Compliance Method:

The short term allowable emission rate is based on the graphic demonstration conducted on June 23, 1992. This demonstration was performed using solvent S280. The resulting emission factor will be acceptable until the process or the solvent used changes, at that time the facility may be required to re-test in accordance with the requirements of OAV Rule 3745-21-10(D). Compliance with the yearly limitation will be demonstrated by the Monitoring and Recordkeeping requirements specified in d)(2).

b. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 1 of OAC rule 3745-21-25 for cleaning operations, materials storage operations, and mixing operations.



**Final Permit-to-Install and Operate**  
HERITAGE MARBLE OF OHIO INC  
**Permit Number:** P0007407  
**Facility ID:** 0125251039  
**Effective Date:** 9/26/2013

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 1 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O).

- g) Miscellaneous Requirements
  - (1) None.



**2. R001, MOULD GEL COATING**

**Operations, Property and/or Equipment Description:**

Polystyrene gel coat booth-Binks #12-7-TLH

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c)(1), c)(2), d)(1), d)(2), e)(2), and f)(1)
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 01-5229, issued 4/26/95)	BAT has been determined to be:  continued use of a HVLP spray gun;  application of not more than 32 pounds of gel coat per hour; and
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid MACT and Title V)	6.7 tons of HAPs per rolling, 12-month period  See c)(1) and c)(2)
c.	OAC rule 3745-17-11(C)	See c)(3), c)(4), d)(3)-d)(7) and e)(2)a.v.
d.	OAC rule 3745-21-25(D)(1)	See b)(2)a., d)(9), and f)(1)c.
e.	OAC rule 3745-21-25(D)(4)	See b)(2)b., d)(8), d)(9), and f)(1)b.



(2) Additional Terms and Conditions

- a. The following work practice standards from table 1 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

\* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.



- b. In accordance with OAC rule 3745-21-25(D)(4), this emissions unit is subject to the VOC emissions limits in table 2 of OAC rule 3745-21-25 because the facility has reinforced plastic composites production operations and manufactures large reinforced plastic composites parts.

The following VOC emissions limits from table 2 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Resin application method or gel coat type	VOC emissions limit*
Open molding: gel coat**	Tooling gel coat	440 lb/ton
	White/off white pigmented gel coat	267 lb/ton
	All other pigmented gel coat	377 lb/ton
	CR/HS or high performance gel coat	605 lb/ton
	Fire retardant gel coat	854 lb/ton
	Clear production gel coat	522 lb/ton

\*VOC emissions limits for open molding and centrifugal casting are expressed as pounds of VOC per ton of resin or gel coat (pounds per ton). The operation shall be at or below these values on a twelve-month, rolling average.

\*\* If applying gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If using multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the owner or operator may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit. The emissions of HAPs from this emission unit shall not exceed 6.7 tons per year, based upon a rolling, 12-month summation of the emissions. The 6.7 ton per rolling, 12-month summation is derived from the 58,000 pounds of gel coating limitation referenced in section c)(2) below.
- (2) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gel



coating usage, upon issuance of this permit. The usage of gel coating shall not exceed 58,000 pounds of gel coating, based upon a rolling, 12-month summation of the gel coating usage.

- (3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (4) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect the following information each day for the gel coating operation:
  - a. the company identification of the materials employed;
  - b. the number of pounds employed;
  - c. the VOC content, in pounds of VOC per pound of material, minus water and exempt solvents;
  - d. the total hours of daily operations;
  - e. the hourly gel coating usage (b. divided by d.);
  - f. the monthly gel coating usage (cumulative of daily usage records in b.); and
  - g. the rolling, 12-month summation of gel coating usage (the summation of the gel coating usage from f. for the present month plus the summation of the previous 11 months of operation).
- (2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)<sup>1</sup> that are applied in the emissions unit:
  - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
  - b. the name/identification of each individual HAP contained in each material applied (and identified in a. above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
  - c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;



- d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of  $A_{b@}$  times  $A_{c@}$  for all the materials applied during the month, divided by 2,000 pounds;
- e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from  $A_{d@}$  above;
- f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in  $A_{d@}$  above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in  $A_{e@}$  above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be



made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
  - (8) The permittee shall collect and record the following information for each month:
    - a. The total quantity applied, in tons, for each type of gel coat identified in Table 2 of OAC rule 3745-21-25;
    - b. The total VOC emissions, in pounds, for each type of gel coat identified in Table 2 of OAC rule 3745-21-25;
    - c. The total VOC emissions, in tons, from all gel coats and cleanup materials employed;
    - d. The actual monthly VOC emissions rate, in pounds of VOC per ton of gel coat applied, for each type of gel coat identified in Table 2 of OAC rule 3745-21-25; and
    - e. The rolling, 12-month VOC emissions rate, in pounds of VOC per ton of gel coat applied, for each type of gel coat identified in Table 2 of OAC rule 3745-21-25.
  - (9) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards and VOC emissions limit(s) for OAC rule 3745-21-25 in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O) and 3745-21-25(P).
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. all exceedances of 32 pounds per hour gel coat usage limitation;
      - ii. all exceedances of the rolling, 12-month limitation on gel coating usage;



- iii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed;
  - iv. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed; and
  - v. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

6.7 tons of HAPs per rolling, 12-month period

- a. Applicable Compliance Method:

Compliance with the 6.7 tons of HAPs will be achieved by adhering to the 58,000 pounds of gel coating usage per rolling, 12-month period. Compliance is demonstrated through the Monitoring and Recordkeeping requirements specified in d)(1) and d)(2).



b. Emission Limitation:

VOC emissions shall not exceed the limits established for each type of gel coat in table 2 of OAC rule 3745-21-25.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable VOC emissions limitations from table 2 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O) and the recordkeeping required in d)(1).

c. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 1 of OAC rule 3745-21-25 for cleaning operations, materials storage operations, and mixing operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 1 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O).

g) Miscellaneous Requirements

(1) None.



**3. Emissions Unit Group -Mixers and layup: P002,P003,P004,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P002	Hand Lay up area
P003	Marble Matrix, Automated mixer
P004	Polystyrene Granite Matrix Mixer

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d., d)(5), d)(6), d)(7), d)(8) and e)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), c)(2), d)(1)-d)(3), e)(2), and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 01-5229, issued 4/26/95)	Emissions shall not exceed:  3.6 pounds VOC per hour from P002, P003, and P004, combined  350 pounds styrene resin per hour from P002, P003, and P004, combined  See c)(1)
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid MACT and Title V)	2.4 tons of HAPs per rolling, 12-month period for P002, P003, and P004, combined  See c)(1) and c)(2)
c.	OAC rule 3745-21-25(D)(1)	See b)(2)a., d)(4), and f)(1)d.
d.	ORC 3704.03(F)	See d)(5), d)(6), d)(7), d)(8) and e)(4)



(2) Additional Terms and Conditions

- a. The following work practice standards from table 1 of OAC rule 3745-21-25 apply to this emissions unit:

Type of operation	Work practice standards
Cleaning operation (cleaning of equipment used in reinforced plastic composites manufacture)	Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
Mixing*	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1.0 inch are permissible around mixer shafts and any required instrumentation.
	Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a ninety-five per cent efficient control device are exempt from this requirement.
	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

\* Containers of five gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of five hundred square inches or less may be open while active mixing is taking place.



c) Operational Restrictions

- (1) These emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the resin usage, upon issuance of this permit. The maximum annual resin usage for these emission units shall not exceed 250 tons of resin, based upon a rolling, 12-month summation of the usage figures for P002, P003, and P004, combined.
- (2) These emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit. The emissions of HAPs from these emission units shall not exceed 2.4 tons per year, combined, based upon a rolling, 12-month summation of the emissions from P002, P003, and P004, combined.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect the following information each day for the resin mixers and hand lay up operation (P002, P003, and P004, combined):
  - a. the company identification of the materials employed;
  - b. the number of pounds employed;
  - c. the VOC content, in pounds of VOC per pound of material, minus water and exempt solvents;
  - d. the total hours of daily operations;
  - e. total VOC emissions for P002, P003, and P004 (summation of  $b * c$ ., combined); and
  - f. the number of pounds of resin applied per hour (e. divided by d.)
- (2) The permittee shall collect and record the following information each month for the resin mixing operations and the hand lay up operation (P002, P003, and P004, combined):
  - a. the company identification of the materials employed;
  - b. the styrene content of each material, in pounds of styrene, per pound of resin, as applied;
  - c. the number of pounds of resin employed;
  - d. total styrene emissions for P002, P003, and P004 (summation of  $b * c$ ., combined);
  - e. total hours of daily operation;
  - f. styrene emissions per hour (d divided by e); and



- g. the total pounds of resin employed, in tons per month and pounds or tons per rolling, 12-month period for P002, P003, and P004, combined.

These records, as well as any supporting coating analyses and computations, shall be retained in the company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review, upon request.

- (3) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)<sup>1</sup> that are applied in these emissions unit:
  - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
  - b. the name/identification of each individual HAP contained in each material applied (and identified in Aa above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
  - c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
  - d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of Ab times Ac for all the materials applied during the month, divided by 2,000 pounds;
  - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from Ad above;
  - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in Ad above, for the present month plus the previous 11 months of operation, in ton(s); and
  - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in Ae above, for the present month plus the previous 11 months of operation, in ton(s).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (4) The permittee shall maintain the records necessary to demonstrate compliance with the applicable work practice standards and VOC emissions limit(s) for OAC rule 3745-21-25 in accordance with OAC rules 3745-21-25(E), 3745-21-25(G), 3745-21-25(O) and 3745-21-25(P).
- (5) The FEPTIO application for this emission unit P004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as



specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Styrene  
TLV (mg/m3): 213  
Maximum Hourly Emission Rate (lbs/hr): 8  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 927  
MAGLC (ug/m3): 5071



The permittee, has demonstrated that emissions of styrene and methyl methacrylate, from emissions unit P004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);



- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. all exceedances of the 350 pounds of polyester resin per hour;
      - ii. all exceedances of the rolling, 12-month resin usage limitation of 250 tons;
      - iii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and
      - iv. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed.
    - b. the probable cause of each deviation (excursion);
    - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
    - d. the magnitude and duration of each deviation (excursion).



If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

3.6 pounds VOC per hour for P002, P003, and P004, combined

Applicable Compliance Method:

Compliance shall be demonstrated through the Monitoring and Recordkeeping as described in d)(1).

b. Emission Limitation:

350 pounds of polyester resin per hour for P002, P003, and P004, combined

Applicable Compliance Method:

Compliance shall be demonstrated through the Monitoring and Recordkeeping as described in d)(2).

c. Emission Limitation:

2.4 tons of HAPs per rolling, 12-month period for P002, P003, and P004, combined



Applicable Compliance Method:

Compliance with the 2.4 tons of HAPs is achieved by adhering to the 250 tons of resin usage per rolling 12-month period for P002, P003, and P004, combined. Compliance shall be demonstrated through the Monitoring and Recordkeeping as described in d)(1), d)(2), and d)(3), in conjunction with the following equation: pounds of resin per month \* 0.32 (percent styrene) \* 0.03 (AP-42 worst case open mixer)

d. Emission Limitation:

The permittee shall comply with the applicable work practice standards from table 1 of OAC rule 3745-21-25 for cleaning operations, materials storage operations, and mixing operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the applicable work practice standards from table 1 of OAC rule 3745-21-25 in accordance with OAC rule 3745-21-25(O).

g) Miscellaneous Requirements

(1) None.