



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
BUTLER COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

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Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05090

DATE: 6/27/2002

Agean Marble Mfg Inc
Gary Bolte
9756 Princeton Glendale
Cincinnati, OH 45246

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 6/27/2002
Effective Date: 6/27/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05090

Application Number: 14-05090
APS Premise Number: 1409000935
Permit Fee: **\$100**
Name of Facility: Agean Marble Mfg Inc
Person to Contact: Gary Bolte
Address: 9756 Princeton Glendale
Cincinnati, OH 45246

Location of proposed air contaminant source(s) [emissions unit(s)]:
**9756 Princeton Glendale
Union Township, Ohio**

Description of proposed emissions unit(s):
Modification of PTI 14-05090 to allow an increase in the OC content per gallon of cleanup materials.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	10.96

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Marble casting operation (modification)	OAC rule 3745-31-05 (A)(3)	0.9 TPY OC from coatings (resin) 23.8 lbs OC/day from cleanup 4.36 TPY OC from cleanup
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid MACT and Title V	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-07(G)(2). See term A.2.a.
	OAC rule 3745-21-07 (G)(2)	8 lbs/hr OC from resins 40 lbs/day OC from resins

2. Additional Terms and Conditions

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12 month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the resin usage limits, cleanup material usage limits, OC emission limitations and styrene content limitation.

B. Operational Restrictions

1. The amount of cleanup material used in emissions unit P001 shall not exceed 2.6 gallons/day and 984 gallons/year.
2. The amount of resin used in emission unit P001 shall not exceed 850 lbs/ hr, 4200 lbs/day and 187,000 lbs/year.
3. The styrene content of the resin used in emissions unit P001 shall not exceed 31% by weight.
4. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P001.
5. The OC content of the cleanup materials used in emissions unit P001 shall not exceed 8.86 pounds of OC per gallon.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the entire facility:
 - a. The name and identification number of each Hazardous Air Pollutant (HAP) containing material employed;
 - b. The amount of each HAP containing material employed, in pounds;
 - c. The total individual HAP emissions for each HAP from all HAP containing materials employed, in pounds or tons per month. (This shall be calculated by using the appropriate emissions factor for each individual HAP for each HAP containing material);
 - d. The total combined HAP emissions from all HAP containing material employed, in pounds or tons per month. [This shall be calculated by adding the emissions from (c) for each individual HAP emitted];
 - e. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding

eleven calendar months; and,

- f. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

- 2. The permittee shall collect and record the following information for each day for emissions unit P001.
 - a. The company identification for each resin and cleanup material employed.
 - b. The number of pounds of each resin material employed.
 - c. The percent styrene of each resin employed in this emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all resins, in pounds per day.
 - g. The cleanup material emission rate in pounds per day.
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all resins, in pounds per hour (f/h).
 - j. Documentation on whether each cleanup material is a photochemically reactive material.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "nonphotochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

D. Reporting Requirements

Emissions Unit ID: P001

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit P001:
 - a. An identification of each day during which the average hourly organic compound emissions from the resins exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the resins exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in Part II, T&C B.1 and B.2.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content and/or cleanup material OC content limitation in Part II, T&C B.3 and B.5.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit P001 for the previous calendar year. These reports shall be submitted by January 30 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in Part II term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the OC emission limitations for emissions unit P001 shall be demonstrated by the following for resin use:
 - a. Emission Factor = Base Emission Factor (3%) X % styrene in neat resin.
 - b. #/hr OC emissions = # OC/day divided by the hours of operation
 - c. #/day OC emissions = # resin mixed and poured/day X emission factor

d. $\text{Tons/yr OC emissions} = \text{Tons resin mixed and poured/yr} \times \text{emission factor}$

The base emission factor is from the AP-42, Table 4.12-2.

To document compliance with OAC rule 3745-21-07(G)(2) the permittee must maintain records demonstrating that no more than 850 lbs per hour, 4200 lbs per day and 187,000 lbs per year of resin were employed.

2. Compliance with the OC emission limitations for emissions unit P001 shall be demonstrated by the following for cleanup material use:
 - a. $\text{\#/day OC emissions} = \text{Gallons/day} \times \text{OC emissions per gallon.}$
 - b. $\text{Tons/yr OC emissions} = \text{Gallons/year} \times \text{OC emissions per gallon.}$
3. Compliance with the usage restrictions in Part II, T&C B.1 and B.2 shall be demonstrated by the record keeping in Part II, T&C C.2.

Agean

PTI A

Emissions Unit ID: **P001**

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4. Compliance with the HAP emission limitations in Part II, T&C A.2.a shall be demonstrated by the record keeping in Part II, T&C C.1.
5. Compliance with the styrene content limit and OC content for the cleanup materials in Part II, T&C B.3 and B.5 shall be demonstrated by the record keeping in Part II, T&C C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: Part II sections A, B, C, D and E.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Gel coat spray booth	OAC rule 3745-31-05(A)(3)	5.7 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid MACT and Title V	See term A.2.a.
	OAC rule 3745-21-07(G)(2)	8 lbs/hr OC from gel coat 40 lbs/day OC from gel coat

2. Additional Terms and Conditions

- 2.a The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12 month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the gel coat usage limits, OC emission limitations and styrene content limitation.

B. Operational Restrictions

1. The amount of gel coat material used in emission unit R001 shall not exceed 136 lbs/day and 39,000 lbs/year.
2. The styrene content of the gel coat used in emissions unit R001 shall not exceed 47% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the entire facility:
 - a. The name and identification number of each Hazardous Air Pollutant (HAP) containing material employed;
 - b. The amount of each HAP containing material employed, in pounds;
 - c. The total individual HAP emissions for each HAP from all HAP containing materials employed, in pounds or tons per month. (This shall be calculated by using the appropriate emissions factor for each individual HAP for each HAP containing material);
 - d. The total combined HAP emissions from all HAP containing material employed, in pounds or tons per month. [This shall be calculated by adding the emissions from (c) for each individual HAP emitted];
 - e. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
 - f. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record the following information for each day for emissions unit R001.

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- a. The company identification for each gel coat material employed.
- b. The number of pounds of each gel coat material employed.

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- c. The percent styrene of each gel coat material employed in this emissions unit.
- d. The total organic compound emission rate for all gel coat materials, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all gel coat materials, in pounds per hour (d/e).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit R001:
 - a. An identification of each day during which the average hourly organic compound emissions from the gel coat material (coating) exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the gel coat materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in Part II , T&C B.1.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content material OC content limitation in Part II, T&C B.2.
4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit R001 for the previous calendar year. These reports shall be submitted by January 30 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term Part II , A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating

so.

6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the OC emission limitations for emissions unit R001 shall be demonstrated by the following:
 - a. Emission Factor = 29.2% of Neat Resin Weight as applied with a maximum styrene content of 47 % by weight
 - b. #/hr OC emissions = # OC/day divided by hours of operation
 - c. #/day OC emissions = # gel coat/day X emission factor
 - d. Ton/yr OC emissions = Ton gel coat/yr X emission factor

The base emission factor is from the Composites Fabricators Association Open Molding Emission Model, Dated 5/98.

To document compliance with OAC rule 3745-21-07(G)(2) the permittee must maintain records demonstrating that no more than 27 lbs per hour, 136 lbs per day and 39000 lbs per year of gelcoat were employed.

2. Compliance with the usage restrictions in Part II, T&C B.1 shall be demonstrated by the record keeping in Part II, T&C C.2.
3. Compliance with the HAP emission limitations in Part II, T&C A.2.a shall be demonstrated by the record keeping in Part II, T&C C.1.
4. Compliance with the styrene content limit in Part II, T&C B.2 shall be demonstrated by the record keeping in Part II, T&C C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: Part II sections A, B, C, D and E.