



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
HAMILTON COUNTY
Application No: 14-04879**

DATE: 6/28/00

Moellering Industries Incorporated
Tim Moellering
1213 West York Street
Cincinnati, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2400** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

Betty Gazaway

OH-KY-IN Reg Council of Govts

HCDES

David Scharfonberger CUFA

KY

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STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-04879

Application Number: 14-04879
APS Premise Number: 1431074053
Permit Fee: **To be entered upon final issuance**
Name of Facility: Moellering Industries Incorporated
Person to Contact: Tim Moellering
Address: 1213 West York Street
Cincinnati, OH 45214

Location of proposed air contaminant source(s) [emissions unit(s)]:
**6325 Este Avenue
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Two Gel Coat Lines, Two Marble Casting Lines, Solvent Wipe Cleaning Operation, Sawing-Grinding-Finishing Operation, Two Laminate Lines.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

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 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

Moelling Industries Incorporated
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lead to such sanctions

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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 Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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

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permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(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>
PM	6.8
PM10	2.2
OC	43.0

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>
F001 - Sawing-Grinding-Finishing Operation	OAC rule 3745-31-05(A)(3)	262 lbs PM/week* 6.8 TPY PM* 84 lbs PM ₁₀ /week* 2.2 TPY PM ₁₀ *
	OAC rule 3745-17-07(B)	*The lbs/week and TPY emission limitations for PM and PM ₁₀ are based on the emissions unit's potential to emit. Therefore no weekly or annual record keeping requirements, reporting, or compliance measures are required.
	OAC rule 3745-17-08(B)	Visible particulate emissions from any fugitive dust source shall not exceed twenty per cent opacity as a three- minute average. See term A.2.2.b.

2. Additional Terms and Conditions

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Emissions Unit ID: **F001**

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2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of dust collectors, full enclosure, good handling/storage practices for marble and sawdust, and compliance with the visible emission limitations specified in this permit.

2.b No person shall cause or permit any fugitive dust source to be operated; or any materials to be handled, transported, or stored; without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures for this emissions unit shall include, but not be limited to, the use of dust collectors for the sanding, grinding, and cutting operations, the collection and storage of sawdust and marble dust inside the building or, if outside, stored only in closed containers.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

1. For the purpose of determining compliance with OAC rule 3745-17-07(B)(1), visible particulate emissions of fugitive dust shall be determined according to test method nine as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996".

2. Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies(if applicable)and the operational parameters as submitted in the PTI application 14-04879 submitted 1/7/00.

F. Miscellaneous Requirements

None

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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 - Solvent Wipe Cleaning Operation	OAC rule 3745-31-05(A)(3)	3.0 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr 40 lbs OC/day
	OAC rule 3745-31-05(D)	See term A.2.2.b

2. Additional Terms and Conditions

- 2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations established in this permit and compliance with the air toxics policy.
- 2.b. The total allowable usage 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.

Moellering Industries Incorporated

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Issue

Facility ID: 1431074053

Emissions Unit ID: **P001**

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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Emissions Unit ID: P001

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P001:
 - a. The company identification for each liquid organic material employed.
 - b. The number of gallons of each liquid organic material employed.
 - c. The organic compound content of each liquid organic material, in pounds per gallon.
 - d. The total organic compound emission rate for all liquid organic materials, in pounds of OC

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emitted per day. This is determined by multiplying the OC content by the gallons of liquid organic material employed (d x c).

- e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The monthly organic compound emission rate (the summation of the daily emission rates recorded in line d. for each day of the month the emissions unit operated).
2. The permittee shall collect and record the following information each month for the entire facility:
- a. The company identification for each liquid organic material employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.
 - g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
 - h. 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. For the first twelve months of operation following issuance of this

permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

3. The permit to install for this emissions unit P001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each

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Emissions Unit ID: **P001**

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pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m³): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3646

MAGLC (ug/m³): 4476

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes,

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Emissions Unit ID: **P001**

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the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from emissions unit P001 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 emissions units P001 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 rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions of this permit.
4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover

the previous calendar year.

E. Testing Requirements

1. Compliance with the OC and HAP emission limitations specified in terms A1. and A.2. of this permit shall be determined by the information collected and recorded in terms C.1. and C.2. of this permit.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, C.1, C.2, D.1, D.2, D.3, E.1, and E.2.

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Emissions Unit ID: P002

Issued: To be entered upon final issuance

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>
P002 - Standard Marble Casting	OAC rule 3745-31-05(A)(3)	7.0 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr 40 lbs OC/day
	OAC rule 3745-31-05(D)	See term A.2.2.b

2. Additional Terms and Conditions

- 2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations established in this permit and compliance with the air toxics policy.
- 2.b. The total allowable usage 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.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the

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Emissions Unit ID: **P002**

HAPs usage limits specified in the following table:

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Emissions Unit ID: P002

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<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

3. The styrene content of the resins employed in emissions unit P002 shall not exceed 33% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P002:
 - a. The company identification for each liquid organic material (resin) employed.
 - b. The number of gallons or pounds of each liquid organic material employed.
 - c. The organic compound content (in pounds per gallon) or the styrene content percentage of each liquid organic material, whichever is applicable.

Emissions Unit ID: **P002**

- d. The total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day. To determine emissions from resins used for marble casting, multiply the pounds used by 0.03** then times the styrene content/100.

** Emission Factor taken from AP-42 Fifth Edition, January 1995, Table 4.4.-2
Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The monthly organic compound emission rate (the summation of the daily emission rates recorded in line d. for each day of the month the emissions unit operated).
2. The permittee shall collect and record the following information each month for the entire facility:
- a. The company identification for each liquid organic material employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.
 - g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].

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Emissions Unit ID: **P002**

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- h. 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. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

3. The permit to install for this emissions unit P002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup

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materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from emissions unit P002 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 emissions unit P002 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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- c. An identification of each day during which the styrene content of resins employed exceeded 33 % by weight, and the actual styrene content of the non-compliant resins employed.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions of this permit.
4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

1. Compliance with the OC and HAP emission limitations specified in terms A1. and A.2. of this permit shall be determined by the information collected and recorded in terms C.1. and C.2. of this permit.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the styrene content limit in term B.1 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, B.1, C.1, C.2, D.1, D.2, D.3, E.1, E.2 and E.3.

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>
P003 - Custom Marble Casting	OAC rule 3745-31-05(A)(3)	7.0 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr 40 lbs OC/day
	OAC rule 3745-31-05(D)	See term A.2.2.b

2. Additional Terms and Conditions

- 2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations established in this permit and compliance with the air toxics policy.
- 2.b. The total allowable usage 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.

To ensure federal enforceability during the first 12 calendar months of operation following

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the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

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<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The styrene content of the resins employed in emissions unit P003 shall not exceed 33% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P003:
 - a. The company identification for each liquid organic material (resin) employed.
 - b. The number of gallons or pounds of each liquid organic material employed.
 - c. The organic compound content (in pounds per gallon) or the styrene content percentage of each liquid organic material, whichever is applicable.

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- d. The total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day. To determine emissions from resins used for marble casting, multiply the pounds used by 0.03** then times the styrene content/100.

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** Emission Factor taken from AP-42 Fifth Edition, January 1995, Table 4.4.-2
Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes

- e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The monthly organic compound emission rate (the summation of the daily emission rates recorded in line d. for each day of the month the emissions unit operated).
2. The permittee shall collect and record the following information each month for the entire facility:
- a. The company identification for each liquid organic material employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.
 - g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
 - h. 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. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

3. The permit to install for this emissions unit P003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.3

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

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(ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from emissions unit P003 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 emissions unit P003 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. An identification of each day during which the styrene content of resins employed exceeded 33 % by weight, and the actual styrene content of the non-compliant resins employed.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions of this permit.

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4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

1. Compliance with the OC and HAP emission limitations specified in term A1. and A.2. of this permit shall be determined by the information collected and recorded in term C.1. and C.2. of this permit.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the styrene content limit in term B.1 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, B.1, C.1, C.2, D.1, D.2, D.3, E.1, E.2 and E.3.

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Emissions Unit ID: R001

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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 - Standard Laminate Operation	OAC rule 3745-31-05(A)(3)	16.23 lbs OC/hr* *The lbs/hr OC emission limit is based on the emissions unit's potential to emit. Therefore no hourly record keeping requirements, reporting, or compliance measures are required
	OAC rule 3745-21-07(G)	Non-photochemically reactive materials are employed in this emission unit. Therefore, this emissions unit is exempt from the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-31-05(D)	See terms A.2.2.b, B.2 and B.3. The total combined OC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling, 12-month summation.

2. Additional Terms and Conditions

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Emissions Unit ID: **R001**

- 2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the OC content and usage restrictions, the use of non-photochemically reactive materials and compliance with the air toxics policy.
- 2.b. The total allowable usage 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.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is

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Emissions Unit ID: **R001**

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prohibited.

2. The OC emissions from the adhesive materials employed in emissions unit R001 shall not exceed 5.41 pounds of OC per gallon of adhesive.

3. The total combined annual adhesive usage for emissions units R001 and R002 shall not exceed 4436 gallons based upon a rolling, 12-month summation of the adhesive usage figures.

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Emissions Unit ID: **R001**

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To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the adhesive usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Adhesive Usage (Gallons)</u>
1	370
1-2	740
1-3	1110
1-4	1480
1-5	1850
1-6	2200
1-7	2590
1-8	2960
1-9	3330
1-10	3700
1-11	4070
1-12	4436

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling, 12-month summation of the adhesive usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The company identification of each liquid organic material (adhesive) employed in this emissions unit.
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
 - c. The OC content of each liquid organic material, as applied, in pounds per gallon.
 - d. The total combined adhesive usage for emissions units R001 and R002.

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- e. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the adhesive usage totals recorded in C.1.a.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage totals recorded in line C.1.a. for each calendar month.

2. The permittee shall collect and record the following information each month for the entire facility:

- a. The company identification for each liquid organic material (adhesive) employed.
- b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
- c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
- d. The number of gallons of each liquid organic material employed.
- e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
- f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.
- g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
- h. 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. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be

kept on a facility-wide basis.

3. The permit to install for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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Emissions Unit ID: R001

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.23

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3646

MAGLC (ug/m3): 4476

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior

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to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which a photochemically reactive material was employed in this emissions unit, and the actual average hourly and daily organic compound emissions, for each such day.
 - b. An identification of each day during which the OC content requirements of 5.41 lbs OC per gallon of adhesive was exceeded, and the actual OC content for each such day.
 - c. An identification of each month during which the total combined adhesive usage limitation for emissions unit R001 and R002 of 4436 gallons per year, based on a rolling 12-month summation was exceeded, and the actual adhesive usage for the 12-month period. Also during the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative adhesive usage levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions of this permit.
4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

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Emissions Unit ID: **R001**

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E. Testing Requirements

3. Compliance with the OC and HAP emission limitations specified in term A1., A.2. and B.1 of this permit shall be determined by the information collected and recorded in term C.1. and C.2. of this permit.
 2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
 3. Compliance with the usage limit in term B.3 shall be determined by the records in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, B.1, B.2, B.3, C.1, C.2, D.1, D.2, D.3, E.1, E.2 and E.3.

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Emissions Unit ID: R002

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
R002 - Custom Laminate Operation	OAC rule 3745-31-05(A)(3)	16.23 lbs OC/hr* *The lbs/hr OC emission limit is based on the emissions unit's potential to emit. Therefore no hourly record keeping requirements, reporting, or compliance measures are required
	OAC rule 3745-21-07(G)	Non-photochemically reactive materials are employed in this emission unit. Therefore, this emissions unit is exempt from the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-31-05(D)	See terms A.2.2.b, B.2 and B.3 The total combined OC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY.

2. Additional Terms and Conditions

2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the OC content and usage restrictions, the use of non-photochemically reactive materials and compliance with the air toxics policy.

2.b. The total allowable usage 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.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

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Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The OC emissions from the adhesive materials employed in emissions units R002 shall not exceed 5.41 pounds of OC per gallon of adhesive.
3. The total combined annual adhesive usage for emissions units R001 and R002 shall not exceed 4436 gallons based upon a rolling, 12-month summation of the adhesive usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the adhesive usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Adhesive Usage (Gallons)</u>
1	370
1-2	740
1-3	1110
1-4	1480
1-5	1850
1-6	2220
1-7	2590
1-8	2960
1-9	3330
1-10	3700
1-11	4070
1-12	4436

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling, 12-month summation of the adhesive usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The company identification of each liquid organic material (adhesive) employed in this

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emissions unit.

- b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
- c. The OC content of each liquid organic material, as applied, in pounds per gallon.
- d. The total combined adhesive usage for emissions units R001 and R002.
- e. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the adhesive usage totals recorded in C.1.a.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage totals recorded in line C.1.a. for each calendar month.

2. The permittee shall collect and record the following information each month for the entire facility:
 - a. The company identification for each liquid organic material (adhesive) employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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Emissions Unit ID: **R002**

- g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
- h. 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. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

- 3. The permit to install for this emissions unit R002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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Emissions Unit ID: **R002**

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.23

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3646

MAGLC (ug/m3): 4476

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior

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to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which a photochemically reactive material was employed in this emissions unit, and the actual average hourly and daily organic compound emissions, for each such day.
 - b. An identification of each day during which the OC content requirements of 5.41 lbs OC per gallon of adhesive was exceeded, and the actual OC content for each such day.
 - c. An identification of each month during which the total combined adhesive usage limitation for emissions unit R001 and R002 of 4436 gallons per year, based on a rolling 12-month summation was exceeded, and the actual adhesive usage for the 12-month period. Also during the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative adhesive usage levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions of this permit.
4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

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3. Compliance with the OC and HAP emission limitations specified in term A1. , A.2. and B.1 of this permit shall be determined by the information collected and recorded in term C.1. and C.2. of this permit.

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2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the usage limit in term B.3 shall be determined by the records in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, B.1, B.2, B.3, C.1, C.2, D.1, D.2, D.3, E.1, E.2 and E.3.

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Emissions Unit ID: R003

Issued: To be entered upon final issuance

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>
R003 - Standard Gel Coat Line	OAC rule 3745-31-05(A)(3)	7.0 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	8.0 lbs OC/hr 40 lbs OC/day
	OAC rule 3745-31-05(D)	See term A.2.2.b

2. Additional Terms and Conditions

- 2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations established in this permit and compliance with the air toxics policy.
- 2.b. The total allowable usage 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.

Issue

Emissions Unit ID: R003

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The styrene content of resins employed in emissions unit R003 shall not exceed 46 % by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R003:
 - a. The company identification for each liquid organic material (resin) employed.
 - b. The number of gallons or pounds of each liquid organic material employed.

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- c. The organic compound content (in pounds per gallon) or the styrene content percentage of each liquid organic material, whichever is applicable.
 - d. The total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day. To determine emissions from the gel coat operations, multiply the pounds used by 20.6%*.
 - * Emission Factor taken from CFA Emission Factors Study prepared on 1/15/98, this emission factor is based on a styrene content of 46% by weight.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The monthly organic compound emission rate (the summation of the daily emission rates recorded in line d. for each day of the month the emissions unit operated).
2. The permittee shall collect and record the following information each month for the entire facility:
- a. The company identification for each liquid organic material employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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- g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
- h. 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. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

- 3. The permit to install for this emissions unit R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be

satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from emissions unit R003 exceeded 8 pounds per hour, and the actual average

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hourly organic compound emissions for each such day.

- b. An identification of each day during which the organic compound emissions from emissions unit R003 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. An identification of each day during which the styrene content of resins employed exceeded 46 % by weight, and the actual styrene content of the non-compliant resins employed.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
 3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions of this permit.
 4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

1. Compliance with the OC and HAP emission limitations specified in term A1. and A.2. of this permit shall be determined by the information collected and recorded in term C.1. and C.2. of this permit.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the styrene content limit in term B.1 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, B.1, C.1, C.2, D.1, D.2, D.3, E.1, E.2 and E.3.

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>
R004 - Custom Gel Coat Line	OAC rule 3745-31-05(A)(3)	7.0 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr 40 lbs OC/day
	OAC rule 3745-31-05(D)	See term A.2.2.b.

2. Additional Terms and Conditions

- 2.a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations established in this permit and compliance with the air toxics policy.
- 2.b. The total allowable usage 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.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits

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specified in the following table:

Emissions Unit ID: **R004**

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Emissions Unit ID: **R004**

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage Tons</u>	<u>Maximum Allowable Combined HAP Usage Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The styrene content of resins employed in emissions unit R004 shall not exceed 46 % by weight

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R004:
 - a. The company identification for each liquid organic material (resin) employed.
 - b. The number of gallons or pounds of each liquid organic material employed.
 - c. The organic compound content (in pounds per gallon) or the styrene content percentage of each liquid organic material, whichever is applicable.

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- d. The total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day. To determine emissions from the gel coat operations, multiply the pounds used by 20.6%*.

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* Emission Factor taken from CFA Emission Factors Study prepared on 1/15/98, this emission factor is based on a styrene content of 46% by weight.

- e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
 - g. The monthly organic compound emission rate (the summation of the daily emission rates recorded in line d. for each day of the month the emissions unit operated).
2. The permittee shall collect and record the following information each month for the entire facility:
- a. The company identification for each liquid organic material employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.
 - g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
 - h. 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. For the first twelve months of operation following issuance of this permit, this shall be a cumulative total for each calendar month.

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 field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

3. The permit to install for this emissions unit R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

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(ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled: and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from emissions unit R004 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 emissions unit R004 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. An identification of each day during which the styrene content of resins employed exceeded 46 % by weight, and the actual styrene content of the non-compliant resins employed.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP usage limitation in term A.2.2.b and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative HAP usage limitation.
3. The quarterly deviation reports shall be submitted as specified in the general terms and conditions

Moel

PTI /

Issued: To be entered upon final issuance
of this permit.

Emissions Unit ID: **R004**

Moel

PTI

Emissions Unit ID: **R004**

Issued: To be entered upon final issuance

4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

1. Compliance with the OC and HAP emission limitations specified in term A1. and A.2. of this permit shall be determined by the information collected and recorded in term C.1. and C.2. of this permit.
2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the styrene content limit in term B.1 shall be determined by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.2.2.b, B.1, C.1, C.2, D.1, D.2, D.3, E.1, E.2 and E.3.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04879 Facility ID: 1431074053

FACILITY NAME Moellering Industries Incorporated

FACILITY DESCRIPTION Two Gel Coat Lines. Two Marble Casting CITY/TWP Cincinnati

Emissions Unit ID: **R004**

SIC CODE 2519 SCC CODE 3-01-018-37 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Sawing-Grinding-Finishing Operation

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Lbs/Week	262	6.8	262	6.8
PM ₁₀	Lbs/Week	84	2.2	84	2.2
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Use dust collectors, full enclosure, good handling/storage practices for marble and sawdust, and compliance with the visible emission limitations specified in this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ UK

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 14-04879

Facility ID: 1431074053

FACILITY NAME Moellering Industries Incorporated

FACILITY DESCRIPTION Two Gel Coat Lines. Two Marble Casting CITY/TWP Cincinnati

Emissions Unit ID: **R004**

SIC CODE 2519

SCC CODE 3-01-018-37

EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Standard Marble Casting

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs/hr	8 lbs/hour	7.0	8 lbs/hour	7.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the emission limitations and air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene

NEW SOURCE REVIEW FORM B

PTI Number: 14-04879

Facility ID: 1431074053

FACILITY NAME Moellering Industries Incorporated

FACILITY DESCRIPTION Two Gel Coat Lines. Two Marble Casting CITY/TWP Cincinnati

Emissions Unit ID: **R004**

SIC CODE 2519

SCC CODE 3-01-018-37

EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Custom Marble Casting

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs/hr	8 lbs/hour	7.0	8 lbs/hour	7.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the emission limitations and air toxics policy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene

NEW SOURCE REVIEW FORM B

PTI Number: 14-04879

Facility ID: 1431074053

FACILITY NAME Moellering Industries Incorporated

FACILITY DESCRIPTION Two Gel Coat Lines. Two Marble Casting CITY/TWP Cincinnati

Emissions Unit ID: **R004**

SIC CODE 2519

SCC CODE 3-01-018-37

EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Standard Laminate Operation

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs/hr	16.23 lbs/hour	12*	16.23 lbs/hour	12
Nitrogen Oxides			*R001+ R002		*R001 + R002
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Use of NPRM, OC content limitations, usage limitations and compliance with the air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Toluene

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FACILITY

Emissions Unit ID: **R004**

FACILITY DESCRIPTION Two Gel Coat Lines, Two Marble Casting Lines, Solvent Wipe Cleaning Operation, Sawing-Grinding-Finishing Operation, Two Laminate Lines. CITY/TWP Cincinnati

SIC CODE 2519 SCC CODE 3-01-018-37 EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Custom Laminate Operation

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs/hr	16.23lbs/hour	12.0*	16.23 lbs/hour	12*
Nitrogen Oxides			*R001 + R002		*R001 + R002
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Use of NPRM, OC content limitations, usage limitations and compliance with the air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Toluene

NEW SOURCE REVIEW FORM B

PTI Number: 14-04879 Facility ID: 1431074053

FACILITY NAME Moellering Industries Incorporated

FACILITY DESCRIPTION Two Gel Coat Lines. Two Marble Casting CITY/TWP Cincinnati

Emissions Unit ID: **R004**

SIC CODE 2519 SCC CODE 3-01-018-37 EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Standard Gel Coat Line

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs/hr	8 lbs/hour	7.0	8 lbs/hour	7.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the emission limitations and air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene

78 NEW SOURCE REVIEW FORM B

PTI Number: 14-04879 Facility ID: 1431074053

FACILITY NAME Moellering Industries Incorporated

FACILITY DESCRIPTION Two Gel Coat Lines. Two Marble Casting CITY/TWP Cincinnati

Emissions Unit ID: **R004**

SIC CODE 2519 SCC CODE 3-01-018-37 EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION Custom Gel Coat Line

DATE INSTALLED 7/1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs/hr	8	7.0	8	7.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the emission limitations established in PTI 14-04879

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Styrene