

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **14-05787**

**A. Source Description**

Builders First Source proposes to limit emissions from P001, P002, P003, R001 and R003 to less than HAP major source threshold levels, in order to avoid MACT requirements and become a Synthetic Minor facility.

**B. Facility Emissions and Attainment Status**

Builders First Source is currently a Title V facility with potential HAP emissions exceeding major source levels. The facility is located in Hamilton County, which is non-attainment for ozone.

**C. Source Emissions**

Potential emissions of styrene without limits are 79.6 tons per year. With limits in place, styrene emissions are 9.74 tons per year, and emissions of combined HAPs are 10.39 tons per year.

**D. Conclusion**

Emissions of any single HAP and combination of HAPs will be limited to less than 10 tons per year and 25 tons per year, respectively, thus limiting emission totals to less than major source amounts. The facility will become a synthetic minor source, and not subject to the MACT requirements in 40 CFR 63 Subpart WWWW. Quarterly reports will be required to assure compliance.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
HAMILTON COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 14-05787

**Fac ID:** 1431091117

**DATE:** 2/7/2006

Builders First Source Inc  
Tom Davis  
7600 Colerain Avenue  
Cincinnati, OH 45239

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 **\$1000** 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.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Reg Council of Govs

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IN

**HAMILTON COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05787 FOR AN AIR CONTAMINANT SOURCE FOR  
Builders First Source Inc**

On 2/7/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Builders First Source Inc**, located at **7600 Colerain Avenue, Cincinnati, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05787:

**marblene casting line 1, marblene casting line 2, marble shop cleanup, gel coat line 1, gel coat line 2.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]



**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 14-05787**

Application Number: 14-05787  
Facility ID: 1431091117  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Builders First Source Inc  
Person to Contact: Tom Davis  
Address: 7600 Colerain Avenue  
Cincinnati, OH 45239

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**7600 Colerain Avenue  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**marblene casting line 1, marblene casting line 2, marble shop cleanup, gel coat line 1, gel coat line 2.**

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

**Builders First Source Inc**  
**PTI Application: 14-05787**

**Facility ID: 1431091117**

**Issued: To be entered upon final issuance**  
**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**

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,

**Builders First Source Inc**  
**PTI Application: 14-05787**

**Facility ID: 1431091117**

**Issued: To be entered upon final issuance**

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

**Builders First Source Inc**  
**PTI Application: 14-05787**

**Facility ID: 1431091117**

**Issued: To be entered upon final issuance**

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

**Builders First Source Inc**  
**PTI Application: 14-05787**

**Facility ID: 1431091117**

**Issued: To be entered upon final issuance**

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 permittee shall submit a complete operating permit application within ninety (90) 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>
OC	19.36
PM/PM10	0.16

**Builders First Source Inc**  
**PTI Application: 14-05787**  
**Issued: To be entered upon final issuance**

**Facility ID: 1431091117**

**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 - marblene casting line 1	OAC rule 3745-31-05(A)(3)	Total combined emissions of organic compounds (OC) from emissions units P001 and P002, excluding cleanup, shall not exceed 9.08 tons per year.  See terms and conditions B.1 and B.2.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40CFR63 Subpart WWWW	OC emissions from P001, excluding cleanup, shall not exceed 8 lbs/hr and 40 lbs/day.  See terms and condition A.2.b

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-02(A)(2) shall be demonstrated by the production limitation and the emissions limitations established in this permit.
- 2.b** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from Top Shop Baghouse (F001), Marblene Casting Line 1 (P001), Marblene Casting Line 2 (P002), Marble Shop Cleanup (P003), Mill & Stair Operation (P901), Gelcoat Line 1 (R001) and Gelcoat Line 3 (R003) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records

11

**Build**

**PTI A**

Emissions Unit ID: P001

**Issued: To be entered upon final issuance**

to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual number of batches produced in emissions units P001 and P002, combined shall not exceed 4,380 batches.
2. The use of photochemically reactive materials (PCRM), as defined in OAC rule 3745-21-01(C)(5), for cleanup is prohibited in this emissions unit.

**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 (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;
  - d. the total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b.:
  - 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)]

**Issued: To be entered upon final issuance**

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]; and
- 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. The permittee has existing records demonstrating compliance with the HAP emissions limitations.

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 permittee shall maintain monthly records of the following production parameters for emissions units P001 and P002 combined:
  - a. the number of batches produced;
  - b. total amount of resin applied, tons;
  - c. amount of catalyst in resin, percent (expressed as a decimal);
  - d. OC content of catalyst, percent (expressed as a decimal); and
  - e. the annual OC emissions, excluding cleanup.
- 4. The permittee shall collect and record the following information each month for cleanup material used for this emissions unit:
  - a. the company identification of each liquid organic material employed in this emissions unit; and
  - 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).
- 5. The permit to install for emissions units P001 and P002 was evaluated based on the

**Build  
PTI A**

Emissions Unit ID: P001

**Issued: To be entered upon final issuance**

actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m<sup>3</sup>): 85

Maximum Hourly Emission Rate (lbs/hr): 4.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,886

MAGLC (ug/m<sup>3</sup>): 2029

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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; and
  - b. an identification of each day during which the organic compound emissions from emissions unit P001 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.b. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

**Build  
PTI A**

Emissions Unit ID: P001

**Issued: To be entered upon final issuance**

3. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions units P001 and P002 combined. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
4. The permittee shall submit annual reports that identify any exceedances of the batch production limitation for emissions units P001 and P002 combined, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed as cleanup in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

Total combined organic compound (OC) emissions from P001 and P002 shall not exceed 9.08 tons/yr.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{tons/yr OC} = [(A) \times (B) \times 0.0005] + [(A) \times (C) \times (D) \times 0.0005]$$

where,

A = annual total amount of resin applied, tons;

B = styrene emission factor of 83 lbs/ton of resin (from "Unified Emission Factors

Emissions Unit ID: P001

for Open molding of Composites", July 23, 2001);

C = percent catalyst in resin, percent (percent expressed as a decimal); and

D = OC content of catalyst, percent (percent expressed as a decimal).

b. Emissions Limitations:

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{lbs/hr OC} = (A) \times (C)$$

$$\text{lbs/day OC} = (B) \times (C)$$

where,

A = daily amount of material used, gallons / daily operating hours;

B = daily amount of material used, gallons; and

C = organic compound content of material, lbs/gal.

c. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

**Build****PTI A**

Emissions Unit ID: P001

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term A.2.b. shall be demonstrated by the record keeping requirements specified in term C.2.

2. Formulation data or USEPA method 24 or 24A shall be used to determine the OC contents of the materials used in this emissions unit.
3. Compliance with the operational restriction in term and condition B.1. shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2. shall be determined by the record keeping required in term and condition C.4.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit shall supersede the terms and conditions of PTI 14-04274, issued March 26, 1997, for emissions unit P001.
2. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.4., D. and E.

**Build  
PTI A**

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 - marblene casting line 2	OAC rule 3745-31-05(A)(3)	Total combined emissions of organic compounds (OC) from emissions units P001 and P002, excluding cleanup, shall not exceed 9.08 tons per year.  See terms and conditions B.1 and B.2.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40CFR63 Subpart WWWW	OC emissions from P002, excluding cleanup, shall not exceed 8 lbs/hr and 40 lbs/day.  See terms and condition A.2.b

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation and the emissions limitations established in this permit.
- 2.b The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from Top Shop Baghouse (F001),

**Builders First Source Inc**  
**PTI Application: 14-05787**  
**Issue**

**Facility ID: 1431091117**

Emissions Unit ID: P002

Marblene Casting Line 1 (P001), Marblene Casting Line 2 (P002), Marble Shop Cleanup (P003), Mill & Stair Operation (P901), Gelcoat Line 1 (R001) and Gelcoat Line 3 (R003) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**Build****PTI A**

Emissions Unit ID: P002

**Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The maximum annual number of batches produced in emissions units P001 and P002, combined shall not exceed 4,380 batches.
2. The use of photochemically reactive materials (PCRM), as defined in OAC rule 3745-21-01(C)(5), for cleanup is prohibited in this emissions unit.

**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;
  - d. the total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b.:
  - 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)];

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- 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]; and
- 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. The permittee has existing records demonstrating compliance with the HAP emissions limitations.

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 permittee shall maintain monthly records of the following production parameters for emissions units P001 and P002 combined:
  - a. the number of batches produced;
  - b. total amount of resin applied, tons;
  - c. amount of catalyst in resin, percent (expressed as a decimal);
  - d. OC content of catalyst, percent (expressed as a decimal); and
  - e. the annual OC emissions, excluding cleanup.
4. The permittee shall collect and record the following information each month for cleanup material used for this emissions unit:
  - a. the company identification of each liquid organic material employed in this emissions unit; and

Emissions Unit ID: P002

- 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).
5. The permit to install for this emissions units P001 and P002 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m<sup>3</sup>): 85

Maximum Hourly Emission Rate (lbs/hr): 4.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,886

MAGLC (ug/m<sup>3</sup>): 2029

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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

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diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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; and
  - 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.b. The reports shall be submitted to the Director (the Hamilton County Department

Emissions Unit ID: P002

of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

3. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions units P001 and P002 combined. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
4. The permittee shall submit annual reports that identify any exceedances of the batch production limitation for emissions units P001 and P002 combined, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed as cleanup in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:

Total combined organic compound (OC) emissions from P001 and P002 shall not exceed 9.08 tons/yr.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{tons/yr OC} = [(A) \times (B) \times 0.0005] + [(A) \times (C) \times (D) \times 0.0005]$$

where,

A = annual total amount of resin applied, tons;

**Build  
PTI A**

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

B = styrene emission factor of 83 lbs/ton of resin (from "Unified Emission Factors for Open molding of Composites", July 23, 2001);

C = percent catalyst in resin, percent (percent expressed as a decimal); and

D = OC content of catalyst, percent (percent expressed as a decimal).

b. Emissions Limitations:

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{lbs/hr OC} = (A) \times (C)$$

$$\text{lbs/day OC} = (B) \times (C)$$

where,

A = daily amount of material used, gallons / daily operating hours;

B = daily amount of material used, gallons; and

C = organic compound content of material, lbs/gal.

c. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

**Builders First Source Inc**  
**PTI Application: 14-05787**  
**Issue**

**Facility ID: 1431091117**

Emissions Unit ID: P002

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term A.2.b. shall be demonstrated by the record keeping requirements specified in term C.2.

2. Formulation data or USEPA method 24 or 24A shall be used to determine the OC contents of the materials used in this emissions unit.
3. Compliance with the operational restriction in term and condition B.1. shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2. shall be determined by the record keeping required in term and condition C.4.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit shall supersede the terms and conditions of PTI 14-04274, issued March 26, 1997, for emissions unit P002.
2. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.4., D. and E.

**Build  
PTI A**

Emissions Unit ID: P003

**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>
P003 - marble shop cleanup	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 6.62 tons/yr.
		See terms and conditions B.1 through B.4.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40CFR63 Subpart WWWW	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.
		See terms and condition A.2.b.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations established in this permit and usage limitations.
- 2.b The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from Top Shop Baghouse (F001), Marblene Casting Line 1 (P001), Marblene Casting Line 2 (P002), Marble Shop Cleanup (P003), Mill & Stair Operation (P901), Gelcoat Line 1 (R001) and Gelcoat Line 3 (R003) 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

**Build**

**PTI A**

Emissions Unit ID: P003

**Issued: To be entered upon final issuance**

be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**Build****PTI A**

Emissions Unit ID: P003

**Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The maximum amount of cleanup material used, exclusive of acetone, shall not exceed 1.50 gallons per day and 550 gallons per year.
2. The maximum amount of acetone, shall not exceed 3.50 gallons per day and 1275 gallons per year.
3. The organic compound content of the cleanup material, exclusive of acetone, used in this emissions unit shall not exceed 8.86 lbs/gal.
4. The organic compound content of acetone used in this emissions unit shall not exceed 6.57 lbs/gal.

**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 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 emitted per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
2. The daily records of the material usages and OC emissions collected as specified in term C.1 shall be summed at the end of each calendar month and year.
3. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b.:

Emissions Unit ID: P003

- 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]; and
- 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. The permittee has existing records demonstrating compliance with the HAP emissions limitations.

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.

4. The permit to install for this emissions unit (P003) was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

**Build****PTI A**

Emissions Unit ID: P003

**Issued: To be entered upon final issuance**

Pollutant: acetone

TLV (mg/m<sup>3</sup>): 1,188

Maximum Hourly Emission Rate (lbs/hr): 0.958

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 441.8MAGLC (ug/m<sup>3</sup>): 28,265

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: P003

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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; and
  - 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.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.b. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.
3. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit P003. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
4. The permittee shall submit annual reports that identify any exceedances of the maximum material limitations for emission unit P003 as specified in term and condition B1 through B.4., as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The deviation reports shall be submitted in accordance with the reporting requirements

**Build****PTI A**

Emissions Unit ID: P003

**Issued: To be entered upon final issuance**

of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

Emissions of organic compounds (OC) shall not exceed 6.62 tons/yr.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{tons/yr OC} = (A) \times (B) \times 0.0005$$

where,

A = annual amount of cleanup material used, gallons; and  
B = organic compound content of cleanup material, lbs/gal.

- b. Emissions Limitations:

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\begin{aligned} \text{lbs/hr OC} &= (A) \times (C) \\ \text{lbs/day OC} &= (B) \times (C) \end{aligned}$$

where,

A = daily amount of cleanup material used, gallons / daily operating hours;  
B = daily amount of cleanup material used, gallons; and  
C = organic compound content of cleanup material, lbs/gal.

**Builders First Source Inc**  
**PTI Application: 14-05787**  
**Issue**

**Facility ID: 1431091117**

Emissions Unit ID: P003

c. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term A.2.b. shall be demonstrated by the record keeping requirements specified in term C.3.

2. Formulation data or USEPA method 24 or 24A shall be used to determine the OC contents of the materials used in this emissions unit.
3. Compliance with the operational restrictions in terms and conditions B.1. and B.2 shall be determined by the record keeping required in term and condition C.1 and C.2.
4. Compliance with the operational restrictions in terms and conditions B.3. and B.4 shall be determined by the record keeping required in term and condition C.1.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.3., D. and E.

**Build**  
**PTI A**

Emissions Unit ID: R001

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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>	
R001 - gelcoat line 1	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-31-05(C) Synthetic Minor to avoid 40CFR63 Subpart WWWW
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11	

**Build****PTI A**

Emissions Unit ID: R001

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Applicable Emissions  
Limitations/Control  
Measures

OAC rule 3745-31-05(A)(3).

Total combined organic compound (OC) emissions from R001 and R003, excluding cleanup, shall not exceed 3.50 tons/yr.

OC emissions from R001, excluding cleanup, shall not exceed 8 lbs/hr and 40 lbs/day.

See term A.2.b

Total particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) from R001 and R003 combined shall not exceed 0.81 lb/hr and 0.16 ton/yr.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).

Visible particulate emissions shall not exceed 20 percent opacity as a six minute average, except as specified by rule.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to

**Build**  
**PTI A**

Emissions Unit ID: R001

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- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations established in the permit, use of paper filter to control PE/PM10 emissions and the production limitation.
  
- 2.b** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from Top Shop Baghouse (F001), Marblene Casting Line 1 (P001), Marblene Casting Line 2 (P002), Marble Shop Cleanup (P003), Mill & Stair Operation (P901), Gelcoat Line 1 (R001) and Gelcoat Line 3 (R003) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual number of batches produced in emissions units R001 and R003, combined shall not exceed 4,380 batches.
  
2. The use of photochemically reactive materials (PCRM), as defined in OAC rule 3745-21-01(C)(5), for cleanup is prohibited in this emissions unit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for emissions unit R001:
  - a. the company identification for each liquid organic material 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;
  - d. the total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).

Emissions Unit ID: R001

2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b.:
  - 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]; and
  - 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. The permittee has existing records demonstrating compliance with the HAP emissions limitations.

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 permittee shall maintain monthly records of the following production parameters for emissions units R001 and R003 combined:
  - a. the number of batches produced;
  - b. total amount of gelcoat applied, tons;
  - c. amount of mold release and slurry wax applied, tons;
  - d. OC content of each material used, percent (expressed as a decimal);
  - e. the annual OC emissions, excluding cleanup.

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4. The permittee shall collect and record the following information each month for cleanup material used for this emissions unit:
  - a. the company identification of each liquid organic material employed in this emissions unit; and
  - 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).
  
5. The permit to install for emissions units R001 and R003 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 14.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 375

MAGLC (ug/m3): 2029

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

Emissions Unit ID: R001

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- 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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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 R001 exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions from

**Build  
PTI A**

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

emissions unit R001 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.b. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

3. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions units R001 and R003 combined. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
4. The permittee shall submit annual reports that identify any exceedances of the batch production limitation for emissions units R001 and R003 combined, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed as cleanup in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
  
Total combined organic compound (OC) emissions from R001 and R003 shall not exceed 3.50 tons/yr.

Emissions Unit ID: R001

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{tons/yr OC} = [(A) \times (B) \times 0.0005] + [(A) \times (C) \times 0.0005] + [(D) \times (F) \times 0.0005] + [(E) \times (F) \times 0.0005]$$

where,

A = annual amount of gelcoat applied, tons;  
 B = styrene emission factor of 460 lbs/ton of gelcoat (from "Unified Emission Factors for Open molding of Composites", July 23, 2001);  
 C = methyl methacrylate emission factor of 75 lbs/ton of gelcoat (from "Unified Emission Factors for Open molding of Composites", July 23, 2001);  
 D = annual usage of mold release, pounds;  
 E = annual usage of slurry wax, pounds; and  
 F = VOC content, percent (percent expressed as a decimal).

b. Emissions Limitations:

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\begin{aligned} \text{lbs/hr OC} &= (A) \times (C) \\ \text{lbs/day OC} &= (B) \times (C) \end{aligned}$$

where,

A = daily amount of material used, gallons / daily operating hours;  
 B = daily amount of material used, gallons; and  
 C = organic compound content of material, lbs/gal.

c. Emissions Limitations:

Total combined PE/PM10 emissions from R001 and R003 shall not exceed 0.81 lb/hr and 0.16 ton/yr.

Applicable Compliance Method:

PE/PM10 emissions shall be calculated and compliance determined by using the

**Build****PTI A**

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

following equation:

$$\text{lbs/hr PE/PM10} = (A) \times (B) \times (C) \times (D)$$

$$\text{tons/yr PE/PM10} = (B) \times (C) \times (D) \times (E) \times 0.0005$$

where,

A = hourly amount of gelcoat used, pounds;

B = emission factor of 0.53 lb solids per lb gelcoat (from information contained in PTI application 14-04416, received July 31, 1997);

C = 1 - transfer efficiency of 75%, expressed as a decimal (0.25), (from information contained in PTI application 14-04416, received July 31, 1997);

D = 1 - paint booth paper filter control efficiency of 90%, expressed as a decimal (0.10), (from information contained in PTI application 14-04416, received July 31, 1997); and

E = annual amount of gelcoat used, pounds.

## d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term A.2.b. shall be demonstrated by the record keeping requirements specified in term C.2.

## e. Emissions Limitation:

20% opacity, as a six-minute average

**Build****PTI A**

Emissions Unit ID: R001

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Applicable compliance method:

If required, compliance shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, except as specified by rule.

2. Formulation data or USEPA method 24 or 24A shall be used to determine the OC contents of the materials used in this emissions unit.
3. Compliance with the operational restriction in term and condition B.1. shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2. shall be determined by the record keeping required in term and condition C.4.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit shall supersede the terms and conditions of PTI 14-04274, issued March 26, 1997, for emissions unit R001.
2. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.4., D. and E.

**Part III - 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>	Synthetic Minor to avoid 40CFR63 Subpart WWWW
R003 - gelcoat line 3	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-31-05(C)	

**Build****PTI A**

Emissions Unit ID: R003

**Issued: To be entered upon final issuance**

<u>Applicable Emissions Limitations/Control Measures</u>	OAC rule 3745-31-05(A)(3).
Total combined organic compound (OC) emissions from R001 and R003, excluding cleanup, shall not exceed 3.50 tons/yr.	OC emissions from R003, excluding cleanup, shall not exceed 8 lbs/hr and 40 lbs/day.
Total particulate emissions (PE) and Particulate matter emissions 10 microns and less in diameter (PM10) from R001 and R003 combined shall not exceed 0.81 lb/hr and 0.16 ton/yr.	See term A.2.b
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).	
Visible particulate emissions shall not exceed 20 percent opacity as a six minute average, except as specified by rule.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to	

**Build**  
**PTI A**

Emissions Unit ID: R003

**Issued: To be entered upon final issuance**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations established in the permit, use of paper filter to control PE/PM10 emissions and the production limitation.
  
- 2.b** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from Top Shop Baghouse (F001), Marblene Casting Line 1 (P001), Marblene Casting Line 2 (P002), Marble Shop Cleanup (P003), Mill & Stair Operation (P901), Gelcoat Line 1 (R001) and Gelcoat Line 3 (R003) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

**B. Operational Restrictions**

1. The maximum annual number of batches produced in emissions units R001 and R003, combined shall not exceed 4,380 batches.
  
2. The use of photochemically reactive materials (PCRM), as defined in OAC rule 3745-21-01(C)(5), for cleanup is prohibited in this emissions unit.

**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 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;
  - d. the total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).

Emissions Unit ID: R003

2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b.:
  - 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]; and
  - 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. The permittee has existing records demonstrating compliance with the HAP emissions limitations.

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 permittee shall maintain monthly records of the following production parameters for emissions units R001 and R003 combined:
  - a. the number of batches produced;
  - b. total amount of gelcoat applied, tons;
  - c. amount of mold release and slurry wax applied, tons;
  - d. OC content of each material used, percent (expressed as a decimal); and
  - e. the annual OC emissions, excluding cleanup.

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4. The permittee shall collect and record the following information each month for cleanup material used for this emissions unit:
  - a. the company identification of each liquid organic material employed in this emissions unit; and
  - 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).
  
5. The permit to install for emissions units R001 and R003 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m<sup>3</sup>): 85

Maximum Hourly Emission Rate (lbs/hr): 14.09

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 375

MAGLC (ug/m<sup>3</sup>): 2029

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

Emissions Unit ID: R003

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- 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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where 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 hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions from

**Build  
PTI A**

Emissions Unit ID: R003

**Issued: To be entered upon final issuance**

emissions unit R003 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emissions limitations set forth in term A.2.b. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

3. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions units R001 and R003 combined. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
4. The permittee shall submit annual reports that identify any exceedances of the batch production limitation for emissions units R001 and R003 combined, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed as cleanup in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
  
Total combined organic compound (OC) emissions from R001 and R003 shall not exceed 3.50 tons/yr.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\text{tons/yr OC} = [(A) \times (B) \times 0.0005] + [(A) \times (C) \times 0.0005] + [(D) \times (F) \times 0.0005] + [(E) \times (F) \times 0.0005]$$

where,

A = annual amount of gelcoat applied, tons;  
 B = styrene emission factor of 460 lbs/ton of gelcoat (from "Unified Emission Factors for Open molding of Composites", July 23, 2001);  
 C = methyl methacrylate emission factor of 75 lbs/ton of gelcoat (from "Unified Emission Factors for Open molding of Composites", July 23, 2001);  
 D = annual usage of mold release, pounds;  
 E = annual usage of slurry wax, pounds; and  
 F = VOC content, percent (percent expressed as a decimal).

b. Emissions Limitations:

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

OC emissions shall be calculated and compliance determined by using the following equation:

$$\begin{aligned} \text{lbs/hr OC} &= (A) \times (C) \\ \text{lbs/day OC} &= (B) \times (C) \end{aligned}$$

where,

A = daily amount of material used, gallons / daily operating hours;  
 B = daily amount of material used, gallons; and  
 C = organic compound content of material, lbs/gal.

c. Emissions Limitations:

Total combined PE/PM10 emissions from R001 and R003 shall not exceed 0.81 lb/hr and 0.16 ton/yr.

Applicable Compliance Method:

PE/PM10 emissions shall be calculated and compliance determined by using the

**Build****PTI A**

Emissions Unit ID: R003

**Issued: To be entered upon final issuance**

following equation:

$$\text{lbs/hr PE/PM10} = (A) \times (B) \times (C) \times (D)$$

$$\text{tons/yr PE/PM10} = (B) \times (C) \times (D) \times (E) \times 0.0005$$

where,

A = hourly amount of gelcoat used, pounds;

B = emission factor of 0.53 lb solids per lb gelcoat (from information contained in PTI application 14-04416, received July 31, 1997);

C = 1 - transfer efficiency of 75%, expressed as a decimal (0.25), (from information contained in PTI application 14-04416, received July 31, 1997);

D = 1 - paint booth paper filter control efficiency of 90%, expressed as a decimal (0.10), (from information contained in PTI application 14-04416, received July 31, 1997); and

E = annual amount of gelcoat used, pounds.

## d. Emissions Limitations:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term A.2.b. shall be demonstrated by the record keeping requirements specified in term C.2.

## e. Emissions Limitation:

20% opacity, as a six-minute average

**Build****PTI A**

Emissions Unit ID: R003

**Issued: To be entered upon final issuance**

Applicable compliance method:

If required, compliance shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, except as specified by rule.

2. Formulation data or USEPA method 24 or 24A shall be used to determine the OC contents of the materials used in this emissions unit.
3. Compliance with the operational restriction in term and condition B.1. shall be determined by the record keeping required in term and condition C.3.
4. Compliance with the operational restriction in term and condition B.2. shall be determined by the record keeping required in term and condition C.4.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit shall supersede the terms and conditions of PTI 14-04274, issued March 26, 1997, for emissions unit R003.
2. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.4., D. and E.