State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
HAMILTON COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 14-05369

DATE: 6/17/2003

Nisbet Brower Marble LLC
Carl Ahrens
100 Commerce Blvd
Loveland, OH 45140

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/17/2003**
Terms and Conditions **Effective Date: 6/17/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05369

Application Number:	14-05369
APS Premise Number:	1431404135
Permit Fee:	**$100**
Name of Facility:	Nisbet Brower Marble LLC
Person to Contact:	Carl Ahrens
Address:	100 Commerce Blvd Loveland, OH 45140

Location of proposed air contaminant source(s) [emissions unit(s)]:
10801 Reading Road
Cincinnati, Ohio

Description of proposed emissions unit(s):
Revise emission factor to allow greater throughput for P001.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. 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.

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. Construction of New Sources(s)

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

6. 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.

7. 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.

8. 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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

Pollutant	Tons Per Year
OC	29.47
PM/PM10	4.82

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

MACT "Hammer" Requirements

1. The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastics Composite Production, 40 CFR Part 63, Subpart WWWW. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.

2. If the final NESHAP standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard or by May 15, 2003, whichever is later. It must contain the following information, unless otherwise specified by future U.S. EPA regulations:

   a. for a new affected source, the anticipated date of startup of operation;
   b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
   c. any existing federal, State, or local limitations or requirements applicable to the affected source;
   d. for each affected emission point or group of affected emission points, an identification of control technology in place;
   e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
   f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

3. The Part II application for a MACT determination may, but is not required to, contain the following information:

   a. recommended emission limitations for the affected source and support information (the permittee may recommend a specific design, equipment, work practice, or operational

standard, or combination thereof, as an emission limitation);

b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and

c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

4. If the NESHAP is promulgated before the Part II application is due for the relevant source category, the permittee may be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. If subject, the permittee shall submit the following notifications:

a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):

i. the name and mailing address of the permittee;

ii. the physical location of the source if it is different from the mailing address;

iii. identification of the relevant MACT standard and the source's compliance date;

iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and

v. a statement confirming the facility is a major source for HAPs.

b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Marble Casting and Solid Surface Casting Processes - Modification	OAC rule 3745-31-05(A)(3)	6.06 lbs/hr OC from coatings 40 lbs/day OC from coatings 7.3 TPY OC from coatings 974.6 lbs/month OC from cleanup 5.85 TPY OC from cleanup The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-28.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the OC emissions limitations, cleanup material usage limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P001 shall not exceed 110 gallons/month and 1320 gallons/year.

2. The styrene content of the resin used in emissions unit P001 shall not exceed 32% by weight for marble casting and 36.5 % by weight for solid surface casting.

3. The permittee shall employ nonphotochemically reactive cleanup material in emissions unit P001.

4. The permittee shall employ cleanup materials in emissions unit P001 which have a maximum OC content of 8.86 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P001:

   a. The company identification for each coating (neat resin) and cleanup material employed.

   b. The number of gallons of each coating material employed.

   c. The percent styrene of each coating employed in this emissions unit.

   d. The number of gallons of cleanup material employed.

   e. The organic compound content of the cleanup material, in pounds per gallon.

   f. The total organic compound emission rate for all coatings, in pounds per day.

   g. The cleanup material emission rate in pounds per day.

   h. The total number of hours the emissions unit was in operation.

   i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).

   j. Documentation on whether each cleanup material is a photochemically reactive material.

   [Note: The coating information must be for the coatings as employed, including any thinning

solvents added at the emissions unit. Also, the definitions of "nonphotochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit P001:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings exceeded 6.06 pounds per hour, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the styrene content and/or cleanup material OC content limitation in T&C A.II.2 and A.II.4.

4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit P001 for the previous calendar year. These reports shall be submitted by January 30 of each year.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 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.

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings in emissions unit P001 shall be demonstrated by the following:

   a. Emission Factor = 0.015 pounds of styrene emissions per pound of styrene employed, based on company provided casting emission test data, dated 02/28/1998.

   b. lbs/hr OC emissions = (decimal fraction styrene content) * (0.015) * (pounds of resin employed during the day) / (hours of production for each day)

c. lbs/day OC emissions =(decimal fraction styrene content) * (0.015) * (pounds of resin employed during the day)

d. Tons/yr OC emissions = sum of the daily organic compound emissions for the year / 2000

2. Compliance with the OC emission limitations for cleanup materials in emissions unit P001 shall be demonstrated by multiplying the OC content by the cleanup material usage rate.

3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1.

4. Compliance with the styrene content limit and OC content for the cleanup materials in T&C A.II.2 and A.II.4 shall be demonstrated by the recordkeeping in T&C A.III.1.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install 14-05369 issued on February 20, 2003 for this emissions unit.

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Marble Casting and Solid Surface Casting Processes Modified		See term B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P001 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant: styrene
   TLV (ug/m3): 85,200

Emissions Unit ID: P001

Maximum Hourly Emission Rate (lbs/hr): 6.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3):1449.7
MAGLC (ug/m3): 2028

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

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-17-11
R001 - Gel Coat Booth 1	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-31-28	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions Limitations/Control Measures
5.52 lbs/hr OC from coatings (gel coat) 40 lbs/day OC from coatings (gel coat) 7.3 TPY OC from coatings (gel coat) 178 lbs/month OC from cleanup 0.86 TPY OC from cleanup 0.551 lb PM10/hour 2.41 TPY PM/PM10
The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-28, 3745-17-07(A)(1) and OAC rule 3745-17-11.
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
See term A.I.2.b and A.II.3
Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
0.551 lb PM/hour

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the OC and HAP emissions limitations, cleanup material usage limitations and compliance with the Air Toxics Policy.

2.b The permittee shall comply with the following emission limits in pounds of HAP (Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

Material	Limit
Pigmented Production-White Gel Coat	267
Pigmented Production-Non-White Gel Coat	377
Clear Production Gel Coat	522

This limit may be based on a rolling, 12-month average.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit R001 shall not exceed 27 gallons/month and 260 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup material in emissions unit R001.

3. The permittee shall employ non-HAP containing cleanup materials in emissions unit R001.

4. The permittee shall employ cleanup materials in emissions unit R001 which have a maximum density of 6.6 pounds of OC per gallon, as applied.

5. This emissions unit shall be operated and maintained in accordance with manufacturer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

6. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.

III. Monitoring and/or Recordkeeping Requirements

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

R001:

a. The company identification for each gel coat and cleanup material employed.

b. The number of gallons of each gel coat material employed.

c. The percent styrene of each gel coat employed in this emissions unit.

d. The number of gallons of cleanup material employed.

e. The organic compound content of the cleanup material, in pounds per gallon.

f. The total organic compound emission rate for all gel coats, in pounds per day.

g. The cleanup material emission rate in pounds per day.

h. The total number of hours the emissions unit was in operation.

i. The average hourly organic compound emission rate for all gel coats, in pounds per hour (f/h).

j. Documentation on whether each cleanup material is a photochemically reactive material or contains HAP's.

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

2. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.6.

3. The permittee shall collect and record the following information for each month for emissions unit R001:

a. The average pounds of HAP per ton of gel coat for each material listed in term A.I.2.b.

b. The updated rolling, 12-month average pounds of HAP per ton of gel coat for each material listed in term A.I.2.b.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit R001:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings exceeded 5.52 pounds per hour, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cleanup material OC content limitation in T&C A.II.4.

4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit R001 for the previous calendar year. These reports shall be submitted by January 30 of each year.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

6. The permittee shall submit deviation (excursion) reports which identify all exceedances of the HAP emission limits in term A.I.2.b.

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

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings employed in emissions unit R001 shall be demonstrated by the following:

a. Emission Factor = Emission Rate in Pounds of Styrene per Ton of Gelcoat Processed per CFA Unified Emissions Factors table revised July 23, 2001

b. #/hr OC emissions = # gel coat/hr X emission factor(determined by styrene content in gelcoat)/2000

c. #/day OC emissions = # gel coat/day X emission factor (determined by styrene content in gelcoat)/2000

d. Ton/yr OC emissions = Ton gel coat/yr X emission factor (determined by styrene content in gelcoat)/2000

The emission factors are from the Composites Fabricators Association Open Molding of Composites, Unified Emissions Factors table Dated 7/2001.

2. Compliance with the OC emission limitations for cleanup materials in emissions unit R001 shall be demonstrated by multiplying the OC content by the cleanup material usage rate.

3. Compliance with the limitations in T&C A.II.1 and A.II.2 shall be demonstrated by the recordkeeping in T&C A.III.1.

4. Compliance with the OC content limitation for the cleanup materials in T&C A.II.4 shall be demonstrated by the recordkeeping in T&C A.III.1.

5 Compliance with the limitations in T&C A.II.3 shall be demonstrated by the recordkeeping T&C A.III.1.

6. The gel coat HAP contents may be based on Material Safety Data Sheets or resin specification sheets.

7. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").

8. Compliance with the particulate emission rate shall be demonstrated by the following:

a. Lbs/hr. = # gel coat/hr x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .90 Control efficiency).

b. TPY = # gel coat/year x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .90 Control efficiency) X ton/2000 lbs.

9. Compliance with the HAP emission limits in term A.I.2.b shall be demonstrated by the record keeping in term A.III.3.

VI. Miscellaneous Requirements

1. The MACT determination was based on a PowerPoint presentation from Keith Barnett of USEPA dated February 1, 2002.

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - Gel Coat Booth 1		See term B.III.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

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

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

   Pollutant: styrene
   TLV (ug/m3): 85,200
   Maximum Hourly Emission Rate (lbs/hr): 5.52
   Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3):227.4
MAGLC (ug/m3): 2028

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

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-17-11
R002 - Gel Coat Booth 2	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-31-28	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions Limitations/Control Measures
5.52 lbs/hr OC from coatings(gel coat) 40 lbs/day OC from coatings (gel coat) 7.3 TPY OC from coatings (gel coat) 178 lbs/month OC from cleanup 0.86 TPY OC from cleanup 0.551 lb PM10/hour 2.41 TPY PM/PM10
The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-28, 3745-17-07(A)(1) and OAC rule 3745-17-11.
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
See term A.I.2.b and A.II.3.
Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
0.551 lb PM/hour

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the OC and HAP emissions limitations, cleanup material usage limitations and compliance with the Air Toxics Policy.

2.b The permittee shall comply with the following emission limits in pounds of HAP (Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

Material	Limit
Pigmented Production-White Gel Coat	267
Pigmented Production-Non-White Gel Coat	377
Clear Production Gel Coat	522

This limit may be based on a rolling, 12-month average.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit R002 shall not exceed 27 gallons/month and 260 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup material in emissions unit R002.

3. The permittee shall employ non-HAP containing cleanup materials in emissions unit R002.

4. The permittee shall employ cleanup materials in emissions unit R002 which have a maximum density of 6.6 pounds of OC per gallon, as applied.

5. This emissions unit shall be operated and maintained in accordance with manufacturer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

6. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.

III. Monitoring and/or Recordkeeping Requirements

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

R002:

a. The company identification for each gel coat and cleanup material employed.

b. The number of gallons of each gel coat material employed.

c. The percent styrene of each gel coat employed in this emissions unit.

d. The number of gallons of cleanup material employed.

e. The organic compound content of the cleanup material, in pounds per gallon.

f. The total organic compound emission rate for all gel coats, in pounds per day.

g. The cleanup material emission rate in pounds per day.

h. The total number of hours the emissions unit was in operation.

i. The average hourly organic compound emission rate for all gel coats, in pounds per hour (f/h).

j. Documentation on whether each cleanup material is a photochemically reactive material or contains HAP's.

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

2. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.6.

3. The permittee shall collect and record the following information for each month for emissions unit R002:

a. The average pounds of HAP per ton of gel coat for each material listed in term A.I.2.b.

b. The updated rolling, 12-month average pounds of HAP per ton of gel coat for each material listed in term A.I.2.b.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for emissions unit R002:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings exceeded 5.52 pounds per hour, and the actual average hourly organic compound emissions for each such day.

   b. An identification of each day during which the organic compound emissions from the coatings exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the cleanup material OC content limitation in T&C A.II.4.

4. The permittee shall submit annual reports which specify the total organic compound emissions from emissions unit R002 for the previous calendar year. These reports shall be submitted by January 30 of each year.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

6. The permittee shall submit deviation (excursion) reports which identify all exceedances of the HAP emission limits in term A.I.2.b.

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

V. Testing Requirements

1. Compliance with the OC emission limitations for coatings employed in emissions unit R002 shall be demonstrated by the following:

   a. Emission Factor = Emission Rate in Pounds of Styrene per Ton of Gelcoat Processed per CFA Unified Emissions Factors table revised July 23, 2001

   b. #/hr OC emissions = # gel coat/hr X emission factor(determined by styrene content in gelcoat)/2000

c. #/day OC emissions = # gel coat/day X emission factor (determined by styrene content in gelcoat)/2000

d. Ton/yr OC emissions = Ton gel coat/yr X emission factor (determined by styrene content in gelcoat)/2000

The emission factors are from the Composites Fabricators Association Open Molding of Composites, Unified Emissions Factors table Dated 7/2001.

2. Compliance with the OC emission limitations for cleanup materials in emissions unit R002 shall be demonstrated by multiplying the OC content by the cleanup material usage rate.

3. Compliance with the limitations in T&C A.II.1 and A.II.2 shall be demonstrated by the recordkeeping in T&C A.III.1.

4. Compliance with the OC content limitation for the cleanup materials in T&C A.II.4 shall be demonstrated by the recordkeeping in T&C A.III.1.

5 Compliance with the limitations in T&C A.II.3 shall be demonstrated by the recordkeeping T&C A.III.1.

6. The gel coat HAP contents may be based on Material Safety Data Sheets or resin specification sheets.

7. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").

8. Compliance with the particulate emission rate shall be demonstrated by the following:

a. Lbs/hr. = # gel coat/hr x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .90 Control efficiency).

b. TPY = # gel coat/year x (1 - volatile content, percent by weight) x (1 - .75 overspray control) x (1 - .90 Control efficiency) X ton/2000 lbs.

9. Compliance with the HAP emission limits in term A.I.2.b shall be demonstrated by the record keeping in term A.III.3.

VI. Miscellaneous Requirements

1. The MACT determination was based on a PowerPoint presentation from Keith Barnett of USEPA dated February 1, 2002.

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - Gel Coat Booth 2		See term B.III.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

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

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

   Pollutant: styrene
   TLV (ug/m3): 85,200
   Maximum Hourly Emission Rate (lbs/hr): 5.52
   Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3):227.4
MAGLC (ug/m3): 2028

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

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs

that show the results of the application of the "Air Toxic Policy" for the change.

The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None