

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **14-05084**
Marble Arch Products Inc.

A. Source Description

Marble Arch Products, Inc. has submitted an application to modify PTI 14-4700 to increase the OC emissions for emissions unit R001. This will be a federally enforceable synthetic minor PTI for HAP emissions. The applicable rules are OAC 3745-31-05(A)(3), 3745-31-05(D) and 3745-21-07(G)(2).

B. Facility Emissions and Attainment Status

Marble Arch Products manufactures cultured marble, granite and onyx products. There are two emission units at this facility, P001 which is for a pouring area and R001 which is a gel coat spray booth. This permit application is to increase the OC emissions for R001 but still keep the facility OC emissions less than 10 TPY. The permittee requests to incorporate federally enforceable limitations in this PTI limiting HAP emissions from the entire facility to 9.9 TPY as a rolling, 12-month summation of any single HAP and 24.9 TPY as a rolling, 12-month summation for combined HAPs.

C. Source Emissions

To remain a minor facility, Marble Arch Products, Inc is accepting an OC emission limit of 5.0 TPY for emissions unit R001. This brings this the facility OC emissions to a total of 8.87 TPY OC. The emission limitations outlined in this PTI also limit facility-wide HAPs emissions to 9.9 TPY as a rolling, 12-month summation for any single HAP and 24.9 TPY as a rolling, 12-month summation for combined HAPS. The facility will keep records and submit reports as described in the PTI to ensure compliance with the emission limits.

D. Conclusion

The terms and conditions in this PTI will limit HAP emissions from the entire facility to 9.9 TPY as a rolling, 12-month summation of any single HAP and 24.9 TPY as a rolling, 12-month summation for combined HAPs. The permittee will maintain records and submit reports as outlined in the additional terms and conditions for all emissions units to demonstrate compliance. The emissions limit mentioned above will prevent this facility from becoming a major facility and triggering MACT or the Title V regulations.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

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

CERTIFIED MAIL

Application No: 14-05084

DATE: 2/27/2001

Marble Arch Products Inc.
Michael Rundle
263 Industrial Drive
Franklin, OH 45005

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 **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

HCDES

KY

IN

OH-KY-IN Reg Coun of Govt



**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 14-05084

Application Number: 14-05084
APS Premise Number: 1483040411
Permit Fee: **To be entered upon final issuance**
Name of Facility: Marble Arch Products Inc.
Person to Contact: Michael Rundle
Address: 263 Industrial Drive
Franklin, OH 45005

Location of proposed air contaminant source(s) [emissions unit(s)]:
**263 Industrial Drive
Franklin, Ohio**

Description of proposed emissions unit(s):
Gel coat spray booth - Modification to PTI 14-4700.

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

Marble Arch Products Inc.

Facility ID: 1483040411

PTI Application: 14-05084

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

Marble Arch Products Inc.

Facility ID: 1483040411

PTI Application: 14-05084

Issued: To be entered upon final issuance

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

Marble Arch Products Inc.

Facility ID: 1483040411

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

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

Marble Arch Products Inc.

Facility ID: 1483040411

PTI Application: 14-05084

Issued: To be entered upon final issuance

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	5.0

Marble Arch Products Inc.
PTI / 14 05004
Issue

Facility ID: 1483040411

Emissions Unit ID: **R001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Gel Coat Spray Booth - Modification	OAC rule 3745-31-05(A)(3)	5.0 TPY OC, including cleanup
	OAC rule 3745-31-05(D) Synthetic Minor to avoid MACT and Title V	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D). See term A.2.a.
	OAC rule 3745-21-07(G)(2)	8 lbs OC/hr, including cleanup 40 lbs OC/day, including cleanup

2. Additional Terms and Conditions

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

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

- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with

Marble Arch Products Inc.
PTI Application 14-05004
Issue

Facility ID: 1483040411

Emissions Unit ID: **R001**

the air toxics policy and emission limitations.

- 2.c** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

Marl**PTI****Issued: To be entered upon final issuance**Emissions Unit ID: **R001****B. Operational Restrictions**

1. The styrene content in the gel coat used shall not exceed 47 percent by weight.

C. Monitoring and/or Recordkeeping Requirements

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

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

2. The permittee shall collect and record the following information for each day for emissions unit R001:
 - a. The amount of gel coat used, in pounds;
 - b. The styrene content, in percent by weight;

Marl**PTI**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

- c. The amount of cleanup material used, in pounds;
- d. The daily OC emissions, in pounds, calculated using the following equation:

$$\text{OC emissions} = (a) (\text{the appropriate emission factor}^*) + (c)$$
- e. The total number of hours per day the emissions unit was in operation.
- f. The average hourly OC emissions, in pounds per hour, calculated by dividing (d) by (e).

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

* The emission factors are from the Composites Fabricators Association Open Molding Emission Model, Dated 5/98.

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

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): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 201.7

MAGLC (ug/m³): 2029

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

the "Air Toxic Policy" include the following:

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

Marl**PTI**Emissions Unit ID: **R001****Issued: To be entered upon final issuance**

- b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials 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 HAP emissions limitations set forth in term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
3. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R001 for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. 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 HAPs emission limitations in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.1.
2. Compliance with the OC emission limitation in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.2.
3. Compliance with the styrene content limitation in these terms and conditions shall be demonstrated by the record keeping requirements specified in term C.2.

F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install 14-4700 issued on July 14, 1999 for emissions unit R001 only.
2. The following terms and conditions of this permit are federally enforceable: A., B.1., C.1. - C.2., D and E.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05084 Facility ID: 1483040411

FACILITY NAME Marble Arch Products Inc.

FACILITY DESCRIPTION Gel coat spray booth - Modification to PTI CITY/TWP Franklin
14-4700

SIC CODE 3088 SCC CODE 3-08-007-22 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Gel Coat Spray Booth - Modification

DATE INSTALLED April 1, 2001

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	36.04 lbs/day	4.51	40 lbs/day	5.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

NEW SOURCE REVIEW FORM B

PTI Number: 14-05084 Facility ID: 1483040411

FACILITY NAME Marble Arch Products Inc.

FACILITY DESCRIPTION Gel coat spray booth - Modification to PTI 14-4700 CITY/TWP Franklin

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

PTI 14-05084

Marble Arch Products, Inc.
263 Industrial Drive
Franklin, OH 45005

Premise Number: 1483040411

Marble Arch Products, Inc. manufactures cultured marble, granite and onyx products. This permit application is a modification to a previous PTI 14-4700 to increase the annual emissions limit for R001. They want to increase the emissions for R001 from 3.61 TPY OC to 5.0 TPY OC to allow for future growth in production. To remain a minor facility for HAPs they are accepting the 5.0 TPY limit for this emissions unit. In combination with the other emissions unit, P001, this brings the facility total to 8.87 TPY OC .

BAT for emissions unit R001 is compliance with the air toxics policy and emissions limitations. The applicable OAC rules are 3745-31-05(A)(3), 3745-31-05(D) and 3745-21-07(G)(2).

The actual emissions are 35.04 pounds per day OC from the gel coat and 1 pound per day from the acetone cleanup. The actual TPY emissions from the gel coat are 4.38 TPY plus 0.13 TPY from the cleanup. The actual emissions were calculated using their current maximum hourly usage rate of 15 pounds per hour gel coat. Although the potential OC emissions are calculated using a maximum usage there will not be a usage limit. There will only be an emissions limitation based on the 8 lbs/hr and 40 lbs/day OC from the applicable rule 3745-21-07(G)(2). The facility has demonstrated in their current recordkeeping that it is thorough enough to demonstrate compliance with the required emission limits. The method for calculating the emissions is outlined in the terms and conditions of the permit.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05084 Facility ID: 1483040411

FACILITY NAME Marble Arch Products Inc.

FACILITY DESCRIPTION	Gel coat spray booth - Modification to PTI 14-4700	CITY/TWP	Franklin
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Air toxics modeling was performed for styrene. At the emission rate of 8.0 pounds per hour the maximum concentration is less than the MAGLC of 2028.57 ug/m³. Therefore, the SCREEN3 modeling passes.

Fee: PWR at 0-1000 lbs/hr = \$200

Prepared by: Kathy Baldock

Date prepared: January 31, 2001

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

Marble Arch Products, Inc. has submitted an application to modify PTI 14-4700 to increase the OC emissions for emissions unit R001. This will be a federally enforceable synthetic minor PTI for HAP emissions. The applicable rules are OAC 3745-31-05(A)(3), 3745-31-05(D) and 3745-21-07(G)(2).

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C. Source Emissions

To remain a minor facility, Marble Arch Products, Inc is accepting an OC emission limit of 5.0 TPY for emissions unit R001. This brings this the facility OC emissions to a total of 8.87 TPY OC. The emission limitations outlined in this PTI also limit facility-wide HAPs emissions to 9.9 TPY as a rolling, 12-month summation for any single HAP and 24.9 TPY as a rolling, 12-month summation for combined HAPS. The facility will keep records and submit reports as described in the PTI to ensure compliance with the emission limits.

D. Conclusion

The terms and conditions in this PTI will limit HAP emissions from the entire facility to 9.9 TPY as a rolling, 12-month summation of any single HAP and 24.9 TPY as a rolling, 12-month summation for combined HAPs. The permittee will maintain records and submit reports as outlined in the additional terms and conditions for all emissions units to demonstrate compliance. The emissions limit mentioned above will prevent this facility from becoming a major facility and triggering MACT or the Title V regulations.

Prepared by: Kathy Baldock

Date prepared: February 1, 2001

NEW SOURCE REVIEW FORM B

PTI Number: 14-05084 Facility ID: 1483040411

FACILITY NAME Marble Arch Products Inc.

FACILITY DESCRIPTION	Gel coat spray booth - Modification to PTI 14-4700	CITY/TWP	Franklin
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PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	5.0

APPLICABLE FEDERAL RULES:

NSPS?	NESHAP?	PSD?	OFFSET POLICY?
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WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the Air Toxics Policy and emission limitations.
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IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: Styrene