

Facility ID: 1431091117 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431091117 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - marblene casting line 1	OAC rule 3745-31-05(A)(3) (PTI 14-05787)	Total combined emissions of organic compounds (OC) from emissions units P001 and P002, excluding cleanup, shall not exceed 9.08 tons per year. See section B.1.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C). Emissions of organic compounds (OC) from P001, excluding cleanup, shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid 40 CFR 63 Subpart WWWW	See term A.2.b.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the production limitation and the emission limitations established in permit to install 14-05787.
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from Marblene Casting Line 1 (P001), Marblene Casting Line 2 (P002), Marble Shop Cleanup (P003), Gelcoat Line 1 (R001), Laminate Line (R002), and Gelcoat Line 2 (R003) all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit to install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAP emissions. Compliance with the above limitations shall be based on a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

B. Operational Restrictions

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

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P001:
 - a. the company identification for each liquid organic material (resin) employed;
 - b. the number of gallons or pounds of each liquid organic material employed;
 - c. the organic compound content (in pounds per gallon) or the styrene content percentage of each liquid organic material, whichever is applicable;

- d. the total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b:
- a. the company identification for each liquid organic material employed;
- b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds, or percent, of individual HAP per gallon of liquid organic material, as applied, except for styrene, dimethyl phthalate, and methyl methacrylate, where the appropriate Unified Emission Factor corresponding to the HAP content of the organic material will also be recorded;
- c. the number of gallons, or pounds, of each liquid organic material employed;
- d. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (c) for each liquid organic material];
- e. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
- f. the total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month; and
- g. the updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. The permittee has existing records demonstrating compliance with the HAP emission limitations.
- A listing of the HAP emissions can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Monthly HAP emission records may be kept on a facility-wide basis.
3. The permittee shall maintain monthly records of the following production parameters for emissions units P001 and P002 combined:
- a. the number of batches produced;
- b. total amount of resin applied, tons;
- c. amount of catalyst in resin, percent (expressed as a decimal);
- d. OC content of catalyst, percent (expressed as a decimal); and
- e. the annual OC emissions, excluding cleanup.
4. The permit to install for emissions units P001 and P002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: styrene
 TLV (mg/m3): 85
 Maximum Hourly Emission Rate (lbs/hr): 4.09
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,886
 MAGLC (ug/m3): 2029
- Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-

05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

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

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from emissions unit P001 exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from emissions unit P001 exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month HAP emission limitations set forth in term A.2.b. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.
3. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units P001 and P002 combined. These reports shall be submitted by January 31 of each year and cover the previous calendar year.
4. The permittee shall submit annual reports that identify any exceedances of the batch production limitation for emissions units P001 and P002 combined, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

Emission Limitation:

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

Applicable Compliance Method:

The ton per year of OC emission limitation shall be calculated and compliance determined by using the following equation:

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

where,

A = annual total amount of resin applied, 166.44 tons;
 B = styrene emission factor of 83 lbs/ton of resin (or applicable emission factor corresponding to the resin styrene content from "Unified Emission Factors for Open Molding of Composites", July 23, 2001);
 C = amount of resin applied, 352.3 pounds/batch;
 D = total annual batches, 4380 batches/year;
 E = percent catalyst in resin, (0.3 percent expressed as a decimal); and
 F = OC content of catalyst, percent (94 percent expressed as a decimal).

Emission Limitations:

Emissions of organic compounds (OC) from P001, excluding cleanup, shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations shall be based on the recordkeeping in section C.1
 Compliance with the HAP emissions limitations in term A.2.b shall be demonstrated by the record keeping requirements specified in section C.2.
2. USEPA Methods 24 and 24A shall be used to determine the VOC contents for the materials used in this emissions unit. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the operational restriction in section B.1 shall be determined by the record keeping required in section C.3.

F. Miscellaneous Requirements

1. The terms and conditions of permit to install 14-05787, issued April 6, 2006, shall supersede the terms and conditions of PTI 14-04274, issued March 26, 1997, for emissions unit P001.
2. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D and E.
3. Cleanup emissions are permitted under emissions unit P003 - marble shop cleanup.