

1

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

2

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

3

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

4

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

5

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Marble Arch Products, Inc.** located in **Butler** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

	R001		Gel Coat Spray Booth	
<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>			<u>BAT Determination</u>
P001	Pouring Area - Marble Casting			BAT is satisfied by emission limitations and compliance with air toxics policy

Facility Name: **Marble Arch Products, Inc.**
 Application Number: **14-4587**
 Date: **Draft PTI (Date will be entered upon final issuance)**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
BAT is satisfied by usage and emission limitation and compliance with air toxic policy	Applicable Federal & <u>OAC Rules</u> 3745-15-07 3745-31-05 3745-17-07	(G) (2) *	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>	See General Terms
	3745-17-08*			Less Stringent
	3745-21-07 (G) (2) *			Less Stringent
	3745-15-07			See General Terms
	3745-31-05			See Additional Special Terms and conditions A.3, A.4 and B.2
	3745-21-07			Less Stringent

Facility Name: **Marble Arch Products, Inc.**
 Application Number: **14-4587**
 Date: **Draft PTI (Date will be entered upon final issuance)**

* The emission limitations established by this rule are less stringent than those established by OAC rule 3745-31-05 (BAT)

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	7.48
PM	4.52 **
Single HAP	9.9
Total HAP's	24.9
PM ₁₀	4.52 **

** Assume PM = PM₁₀

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Environmental Services, 1632 Central Parkway, Cincinnati, Ohio 45210.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s)

8

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Environmental Services, 1632 Central Parkway, Cincinnati, Ohio 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. The organic compound (OC) emissions from emissions units P001 shall not exceed 2.6 pounds per hour, 40 pounds per day and 3.87 tons per year (including cleanup material).
2. The particulate/PM₁₀ (PM/PM₁₀) emissions from emissions units P001 shall not exceed 36.2 pounds per day and 4.52 tons per year.
3. The OC emissions from emissions units R001 shall not exceed 3.61 pounds per hour, 40 pounds per day and 3.61 tons per year (including cleanup material).
4. The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be no more than 9.9 TPY for any

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

single HAP and no more than 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the HAP emissions shall not exceed the limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP emissions (tons)</u>	<u>Maximum Allowable Combined HAPs emissions (tons)</u>
1	5.0	12.5
1-2	5.0	12.5
1-3	5.0	12.5
1-4	5.0	12.5
1-5	5.0	12.5
1-6	5.0	12.5
1-7	5.8	14.5
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The styrene content in the resin used in emissions unit P001 shall not exceed 31 percent by weight.
2. The styrene content in the gelcoat used in emissions unit R001 shall not exceed 46 percent by weight.

C. Monitoring and Recordkeeping Requirements

1. The facility shall maintain daily records for emissions unit P001 which include the following information:
 - a. the amount of resin used, in pounds;
 - b. the styrene content, in percent by weight;
 - c. the amount of catalyst used, in pounds;

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

- d. the amount of limestone dust used, in pounds;
 - e. the company name and identification of each cleanup material employed;
 - f. the amount of cleanup material used, in pounds;
 - g. the daily OC emissions calculated using the following equation:

$$\text{OC emissions} = 0.0003 * (a) (b) + 0.153 * (c) + (f)$$
 - h. the daily PM-PM₁₀ emissions calculated using the following equation:

$$\text{PM-PM}_{10} \text{ emissions} = 0.01 * (d)$$
 - i. the number of hours of operation of the emissions unit; and,
 - j. the average hourly OC emissions, in pounds per hour, calculated by dividing (g) by (i).
2. The facility shall maintain daily records for emissions unit R001 which include the following information:
 - a. the amount of gelcoat used, in pounds;
 - b. the styrene content, in percent by weight;
 - c. the amount of catalyst used, in pounds;
 - d. the daily OC emissions calculated using the following equation:

$$\text{OC emissions} = 0.00521 * (a) (b) + 0.153 * (c)$$
 - e. the number of hours of operation of the emissions unit; and
 - f. the average hourly OC emissions, in pounds per hour, calculated by dividing (d) by (e).
 3. The permittee shall collect and record the following information each month for the entire facility:

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

- a. the name and identification number of each Hazardous Air Pollutant (HAP) containing material employed;
- b. the amount of each HAP containing material employed;
- c. the total individual HAP emissions for each HAP from all HAP containing material 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 for each HAP 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. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- 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. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

be kept on a line-by-line basis.

4. 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 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.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit. 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 30 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the hourly and/or daily PM-PM₁₀ and OC emissions limitations set forth in this permit. The permittee shall submit quarterly 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 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters.

If no exceedances occurred during the reporting period then a report is required stating so.

3. 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 Hamilton County Dept. of Environmental Services;
 - 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

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

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 Hamilton County Dept. of Environmental Services. 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 30, April 30, July 30, and October 30 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).

E. Compliance Methods/Testing Requirements

1. Compliance with the PM/PM-10 and OC emissions limitations in Terms A.1, A.2 and A.3 shall be determined by the record-keeping specified in Terms C.1 and C.2.
2. Compliance with the HAPs emissions limitations in Term A.4 shall be determined by the recordkeeping specified in Term C.3.

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 14-4587. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compounds emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr):

= 3.59 (emissions unit R001)

= 1.79 (emissions unit P001)

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1518.9

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2023.81

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 14-4587 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in

Facility Name: **Marble Arch Products, Inc.**

Application Number: **14-4587**

Date: **Draft PTI (Date will be entered upon final issuance)**

the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table; and,
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.