Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/3/2011

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1483040411
Permit Number: P0108561
Permit Type: Initial Installation
County: Warren

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
HCDOES; Indiana; Kentucky

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

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Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Marble Arch Products Inc.

Facility ID:	1483040411
Permit Number:	P0108561
Permit Type:	Initial Installation
Issued:	11/3/2011
Effective:	11/3/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Marble Arch Products Inc.

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Authorization

Facility ID: 1483040411
Facility Description: Manufacturer of cultured marble, granite and onyx products
Application Number(s): A0042089
Permit Number: P0108561
Permit Description: Initial PTI for one (1) emissions unit at an existing reinforced plastic composite production facility to increase the facility-wide PTE HAP emissions, due to a change in the method of operation, to above the Major Source thresholds. This permit incorporates RACT and MACT requirements for facility-wide cleanup (P002) and precedes the Title V permit application the facility will be required to submit.
Permit Type: Initial Installation
Permit Fee: $200.00
Issue Date: 11/3/2011
Effective Date: 11/3/2011

This document constitutes issuance to:

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

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108561
Permit Description: Initial PTI for one (1) emissions unit at an existing reinforced plastic composite production facility to increase the facility-wide PTE HAP emissions, due to a change in the method of operation, to above the Major Source thresholds. This permit incorporates RACT and MACT requirements for facility-wide cleanup (P002) and precedes the Title V permit application the facility will be required to submit.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P002**
Company Equipment ID:	Facility-wide Cleanup Material Usage
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

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, 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 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.

4. Monitoring and Related Record Keeping 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:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Hamilton County Dept. of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Hamilton County Dept. of Environmental Services every six months, 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Hamilton County Dept. of Environmental Services 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).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) 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.

c) 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:

(1) 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.

(2) 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.

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

(4) 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.

d) The permittee shall submit progress reports to the Hamilton County Dept. of Environmental Services 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:

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

(2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 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 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 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 (i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently

removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

1. 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).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P002, Facility-wide Cleanup Material Usage

Operations, Property and/or Equipment Description:

Facility-wide cleanup material usage for cleaning tools and molds

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Emissions of organic compounds (OC) shall not exceed 99.15 pounds per day and 9.20 tons per year (TPY). Emissions of volatile organic compounds (VOC) shall not exceed 7.25 pounds per day and 0.02 TPY. See b)(2)a., b)(2)b., and b)(2)g.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)c.
c.	OAC rules 3745-21-25 (A) through (S)	The affected operations are cleanup using organic HAP-containing cleaners to clean cured resin from application equipment that directly contacts resin and HAP-containing materials storage. See b)(2)d. and b)(2)f.
d.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780 – 5935) [In accordance with 40 CFR 63.5790 and Table 4, this emissions unit includes cleanup using organic HAP-containing cleaners to clean cured	See b)(2)e. and b)(2)i.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	resin from application equipment that directly contacts resin and HAP-containing materials storage at an existing reinforced plastic composites production facility because this emissions unit was installed on 2/1/2000 (new is installed after 8/2/2011) subject to the work practice standards specified in this section.]	
e.	40 CFR Part 63.1 – 15 (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

b. The maximum OC content of each non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 6.61 pounds of OC per gallon, as applied. The maximum VOC content of each HAP/VOC cleanup material employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon, as applied.

The maximum amount of non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 2785 gallons per year. The maximum amount of HAP/VOC cleanup material employed in this emissions unit shall not exceed 5 gallons per year.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install (PTI) P0108561 for this emissions unit takes into the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for OC and VOC, respectively:

i. The maximum OC content of each each non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 6.61 pounds of OC per gallon, as applied;

ii. The maximum amount of non-HAP/non-VOC cleanup material employed in this emissions unit shall not exceed 2785 gallons per year;

iii. Emissions of OC shall not exceed 9.20 tons per year (TPY);

iv. The maximum VOC content of each HAP/VOC cleanup material employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon, as applied;

v. The maximum amount of HAP/VOC cleanup material employed in this emissions unit shall not exceed 5 gallons per year; and

vi. Emissions of VOC shall not exceed 0.02 tons per year (TPY)

d. The following requirements apply to the affected operations in this emissions unit pursuant to Table 1:

i. Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin; and

ii. Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.

e. The following requirements apply to the affected operations in this emissions unit pursuant to Table 4:

i. 63.5805(a)organic HAP containing cleaners for cleaning cured resin

ii. 63.5805(a)HAP-containing materials storage [requirements for HAP-containing materials storage are equivalent to Table 1, Work Practice Standards, in OAC rules 3745-21-25 (A) through (S) for VOC-containing materials storage; see b)(2)d.ii. above].

f. In accordance with paragraph (A)(1) of OAC rule 3745-21-25, this facility is subject to the requirements of OAC rule 3745-21-25. This emissions unit was installed prior to the effective date of the rule and must comply with the requirements of this rule within 12 months from the rule's effective date of December 14, 2010.

In accordance with paragraph (A)(3) of OAC rule 3745-21-25, upon achieving compliance with this rule, the reinforced plastic composites production operations at the facility are not required to meet the February 18, 2008 revision of OAC rule 3745-21-07.

g. The OC and VOC emission limits were established based on the emissions unit's Potential to Emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limits beyond those listed in d) and e).

h. The application submitted for this permit fulfilled the notification requirements of paragraph (S)(1) of OAC rule 3745-21-25.

i. This emissions unit is subject to 40 CFR Part 63, Subpart WWWW. The complete MACT, including MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

a. The company identification of each cleanup material employed;

b. The number of gallons of each cleanup material employed, for each non-HAP/non-VOC cleanup material and for each HAP/VOC cleanup material;

c. The OC content of each cleanup material employed, in pounds OC per gallon of cleanup material, for each non-HAP/non-VOC cleanup material; and

d. The total HAP/VOC content of each cleanup material employed, in pounds VOC per gallon of cleanup material, for each HAP/VOC cleanup material;

e. The total OC emissions from all the non-HAP/non-VOC cleanup materials employed, in pounds [i.e., the summation of the products of d)(1)b. multiplied by d)(1)c. for each non-HAP/non-VOC cleanup material employed]; and

f. The total HAP/VOC emissions from all the HAP/VOC cleanup materials employed, in pounds [i.e., the summation of the products of d)(1)b. multiplied by d)(1).d for each HAP/VOC cleanup material employed].

(2) The permittee shall calculate and record the total annual OC and VOC emission rates from cleanup materials, [i.e., the sum of the daily OC and VOC emission rates, each, from cleanup materials for the calendar year in d)(1)].

(3) The owner or operator shall maintain the following records pursuant to OAC rule 3745-21-25(P):

a. A copy of each applicability notification and compliance status report submitted to comply with OAC rule 3745-21-25, including all documentation supporting any applicability or compliance status; and

b. A certified statement that operations are in compliance with the work practice standards specified in Table 1 of OAC rule 3745-21-25, as applicable.

(4) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart WWWW, including the following sections which are equivalent to the requirements in OAC rule 3745-21-25:

a. 63.5915(a)(1) & (a)(2) retain copies of Notifications & records of Startups, Shutdowns, & Malfunctions (SSM)

b. 63.5915(d) work practice standards compliance certification

e) Reporting Requirements

(1) The owner or operator of a facility that has reinforced plastic composites production operations subject to OAC rule 3745-21-25 shall submit semiannual compliance status reports containing the applicable information specified in paragraph (Q)(3) of the rule. The semiannual compliance status reports shall be submitted no later than thirty calendar days after the end of each six-month period to the Hamilton County Department of Environmental Services. The first compliance report shall cover the period beginning on the compliance date that is specified in paragraph (R) of the rule and ending on June thirtieth or December thirty-first, whichever date is the first date following the end of the first calendar half after the compliance date that is specified in paragraph (R) of the rule. Each subsequent compliance report shall cover the semiannual reporting period from January first through June thirtieth or the semiannual reporting period from July first through December thirty-first.

For each facility that is subject to permitting requirements pursuant to Chapter 3745-77 of the Administrative Code (pertaining to Title V permits), the owner or operator may submit the first and subsequent semiannual compliance reports according to the dates established within the facility's Title V permit, instead of according to the dates specified in paragraph (Q)(1) of OAC rule 3745-21-25.

The compliance report shall contain the information specified in paragraph (Q)(3) of the rule.

a. Company name and address;

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

c. Date of the report and beginning and ending dates of the reporting period;

d. If there are no deviations from any work practice standards in table 1 of this rule, a statement that there were no deviations from work practice standards during the reporting period; and

e. For each deviation from a work practice standard that occurs at an affected operation where a CMS is not used to comply with the work practice standard in the rule, the compliance report shall contain the information in paragraphs (Q)(3)(f)(i) and (Q)(3)(f)(ii) of the rule.

i. The total operating time of each affected operation during the reporting period.

ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

Each facility that has obtained a Title V permit pursuant to Chapter 3745-77 of the Administrative Code shall report all deviations, as described in OAC rule 3745-21-25, in the semiannual monitoring report required by the Title V permit. If the facility submits a semiannual compliance report pursuant to this rule along with, or as part of, the semiannual monitoring report required by the facility's Title V permit, and the semiannual compliance report includes all required information concerning deviations from any VOC emissions limitation, operating limit, or work practice standard in this rule, submission of the semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the appropriate Ohio environmental protection agency district office or local air agency.

(2) The permittee shall submit semiannual reports and other such notifications and reports to the Hamilton County Department of Environmental Services as are required pursuant to 40 CFR Part 63, Subpart WWWW, per the following sections which are equivalent to the requirements in OAC rule 3745-21-25 (except SSM notification):

a. 63.5905(a) Initial Notification per requirement in 63.9(b)(2)

b. 63.5910(b) Semi-annual compliance report & SSM events

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions of organic compounds (OC) shall not exceed 99.15 pounds per day.

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be demonstrated by the recordkeeping in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

15 gallons of acetone/day x 6.61 pounds of OC/gallon acetone = 99.15 pounds of OC/day.

b. Emission Limitation & Voluntary Restriction:

Emissions of organic compounds (OC) shall not exceed 9.20 tons per year (TPY)

Applicable Compliance Method:

Compliance with the annual OC emission limitation & voluntary restriction shall be demonstrated by the recordkeeping in d)(2).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

2785 gallons of acetone/year x 6.61 pounds of OC/gallon acetone x 1 Ton/2000 pounds = 9.20 TPY of OC.

c. Emission Limitation.

Emissions of volatile organic compounds (VOC) shall not exceed 7.25 pounds per day.

<u>Applicable Compliance Method</u>

Compliance with the daily VOC emission limitation shall be demonstrated by the recordkeeping in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

1 gallon of toluene/day x 7.25 pounds of VOC/gallon toluene = 7.25 pounds of VOC/day.

d. Emission Limitation & Voluntary Restriction:

Emissions of volatile organic compounds (VOC) shall not exceed 0.02 TPY.

Applicable Compliance Method:

Compliance with the annual OC emission limitation & voluntary restriction shall be demonstrated by the recordkeeping in d)(2).

The applicable emission limitation was established based on information provided by the permittee in application A0042089 for PTI P0108561:

5 gallons of toluene/year x 7.25 pounds of VOC/gallon toluene x 1 Ton/2000 pounds = 0.02 TPY VOC/HAP.

g) Miscellaneous Requirements

(1) None.