



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/31/2013

Mr. John Beiersdorfer
Moellering Industries dba Sims-Lohman
6325 Este Avenue
Cincinnati, OH 45216

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431074053
Permit Number: P0112494
Permit Type: Renewal
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO 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
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

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. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: SWOAQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Moellering Industries dba Sims-Lohman**

Facility ID:	1431074053
Permit Number:	P0112494
Permit Type:	Renewal
Issued:	1/31/2013
Effective:	1/31/2013
Expiration:	1/31/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
Moellering Industries dba Sims-Lohman

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Final Permit-to-Install and Operate
Moellering Industries dba Sims-Lohman
Permit Number: P0112494
Facility ID: 1431074053
Effective Date: 1/31/2013

Authorization

Facility ID: 1431074053
Application Number(s): A0045984
Permit Number: P0112494
Permit Description: FEPTIO renewal permit for a gel coat and laminates facility.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/31/2013
Effective Date: 1/31/2013
Expiration Date: 1/31/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Moellering Industries dba Sims-Lohman
6325 Este Ave
Cincinnati, OH 45216

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

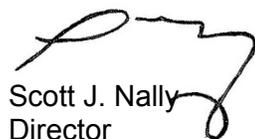
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112494

Permit Description: FEPTIO renewal permit for a gel coat and laminates facility.

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

Emissions Unit ID:	F001
Company Equipment ID:	Sawing-Grinding-Finishing Operation
Superseded Permit Number:	P0098975
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Solvent Wipe Cleaning Operation
Superseded Permit Number:	P0098976
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Standard Marble Casting
Superseded Permit Number:	P0098977
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Custom Marble Casting
Superseded Permit Number:	P0098978
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R001
Company Equipment ID:	Standard Laminate Operation
Superseded Permit Number:	P0098979
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Custom Laminate Operation
Superseded Permit Number:	P0098980
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Standard Gel Coat Line
Superseded Permit Number:	P0098981
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Custom Gel Coat Line
Superseded Permit Number:	P0098982
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Moellering Industries dba Sims-Lohman
Permit Number: P0112494
Facility ID: 1431074053
Effective Date: 1/31/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Moellering Industries dba Sims-Lohman
Permit Number: P0112494
Facility ID: 1431074053
Effective Date: 1/31/2013

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.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2., B.3., B.4., and B.5.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units F001, P001, P002, P003, R001, R002, R003, R004, all de minimis 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 HAPs. Compliance with the above limitations shall be based on a rolling 12-month summation.
3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in any emissions unit listed in B.2 that applies HAP-containing materials in the facility where applicable:
 - a) The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b) The name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon² of each HAP-containing material applied;
 - c) The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d) For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;
 - e) The total combined HAP emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAP emissions from "d" above;
 - f) For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s); and
 - g) The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).



¹ 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 District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

² Alternatively, HAP emissions may be calculated as a Weight Fraction of each HAP-containing material applied.

4. The permittee shall submit quarterly deviation (excursion) reports for any emissions unit that applies HAP-containing materials listed in B.2 that identify:
- a) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) All exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and
 - (2) All exceedances of the rolling, 12-month total combined HAP emission limitation for all the coatings, thinners, additives, and cleanup materials employed..
 - b) The probable cause of each deviation (excursion);
 - c) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

5. Compliance with the HAP's emission limitations in B.2. shall be demonstrated by the record keeping in B.3



Final Permit-to-Install and Operate
Moellering Industries dba Sims-Lohman
Permit Number: P0112494
Facility ID: 1431074053
Effective Date: 1/31/2013

C. Emissions Unit Terms and Conditions



1. F001, Sawing-Grinding-Finishing Operation

Operations, Property and/or Equipment Description:

Sawing-Grinding-Finishing Operation

- 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.
 - (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.
- 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)	Particulate Emissions (PE) shall not exceed 262 pounds per week and 6.8 tons per year. Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 84 pounds per week and 2.2 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).
b.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	See b)(2)b.



- (2) Additional Terms and Conditions
- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of dust collectors, full enclosure, good handling/storage practices for marble and sawdust and compliance with the visible emissions limitations specified in this permit.
 - b. No person shall cause or permit any fugitive dust source to be operated, or any materials to be handled, transported or stored without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures for this emissions unit shall include, but not be limited to the use of dust collectors for the sanding, grinding and cutting operations, the collection and storage of sawdust and marble dust inside the building or, if outside, stored only in closed containers.
 - c. The pounds per week and ton per year emission limitations for PE and PM10 are based on the emissions unit's potential to emit. Therefore, no weekly or annual record keeping requirements, reporting or compliance measures are required.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform a weekly check of the sawdust collection system to verify proper operation. At a minimum this check shall include a visual check of the collection system for any leaks and/or plugs. The permittee shall record the date of inspection and the findings of the inspection. If the system is operating properly, a note to that effect is required.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- 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:

Particulate Emissions (PE) shall not exceed 262 pounds per week and 6.8 tons per year.



Applicable Compliance Method:

The applicable emission limitation was established using the amount of sawdust and marble dust collected in one week then multiplying by a control efficiency of 90% as follows:

$$2624 \text{ lbs/week} \times (1 - .90) = 262 \text{ lbs/week PE}$$

The annual PE limitation was established as follows:

$$262 \text{ lbs/week} \times 52 \text{ weeks/year} \times \text{ton}/2000 \text{ lbs} = 6.8 \text{ TPY PE}$$

b. Emission Limitation:

Particulate emissions 10 microns and less in diameter (PM10) shall not exceed 84 pounds per week and 2.2 tons per year.

Applicable Compliance Method:

PM10 emissions are calculated as 32% of the total particulate emissions.

$$262 \text{ lbs/week PE} \times 32\% = 84 \text{ lbs/week PM10}$$

The annual PE limitation was established as follows:

$$84 \text{ lbs/week} \times 52 \text{ weeks/year} \times \text{ton}/2000 \text{ lbs} = 2.2 \text{ TPY PM10}$$

c. Emission Limitation:

Visible particulate emissions from any fugitive dust emissions point shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



2. P001, Solvent Wipe Cleaning Operation

Operations, Property and/or Equipment Description:

Solvent Wipe Cleaning Operation

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. d)(2).

(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. B)(1)b.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 3.0 tons per year.
b.	OAC rule 3745-31-05(D)	See section B.2.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions unit P001:



- a. The company identification for each liquid organic material employed.
- b. The number of gallons of each liquid organic material employed.
- c. The VOC content of each liquid organic material, in pounds per gallon.
- d. The monthly VOC emission rate. This is determined by multiplying the VOC content of the liquid organic material in lbs/gallon by the number of gallons of liquid organic material employed (b x c).

The monthly VOC emission rates shall be summarized at the end of the year to demonstrate compliance with the annual VOC emissions limitation.

- (2) The permit to install and operate (PTIO) for emissions unit P001 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3646

MAGLC (ug/m3): 4476

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

(3) For HAPs recordkeeping requirements refer to Section B.3.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. HAPs emission deviations as outlined in Section B.4.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the total VOC emissions for the calendar year.

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:
Volatile Organic Compound (VOC) emissions shall not exceed 3.0 tons per year.
Applicable Compliance Method:
Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).
 - (2) Formulation data or USEPA method 24 (for coatings) shall be used to determine the VOC contents of the liquid organic materials.
 - (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.

g) Miscellaneous Requirements

- (1) None.



3. P002, Standard Marble Casting

Operations, Property and/or Equipment Description:

Standard Marble Casting Line No. 1

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. d)(2).

(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. b)(1)b.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year. See c)(1).
b.	OAC rule 3745-31-05(D)	See Section B.2.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit and compliance with the styrene content.

c) Operational Restrictions

(1) The styrene content of the resins employed in emissions unit P002 shall not exceed 33% by weight.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions unit P002:
 - 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 VOC content of each liquid organic material, in pounds per gallon or the styrene content percent by weight of each organic material, whichever is applicable.
 - d. The total monthly VOC emission rate for all liquid organic materials, in pounds of VOC emitted per month. To determine emissions from resins used for marble casting, multiply the pounds used by 0.03* then times the styrene content/100.

* Emission Factor taken from AP-42 Fifth Edition, February 2007, Table 4.4 – 2 Emission Factors for Uncontrolled Polyester Product Fabrication Processes.

The monthly VOC emission rates shall be summarized at the end of the year to demonstrate compliance with the annual VOC emissions limitation.

- (2) The permit to install and operate (PTIO) for emissions unit 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the “Air Toxics Policy.”

- (3) For HAPs recordkeeping requirements refer to Section B.3.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. HAPs emission deviations as outlined in Section B.4.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the following information:
 - a. The total VOC emissions for the calendar year.
 - b. An identification of each day during which the styrene content of resins employed exceeded 33% by weight and the actual styrene content of the non-compliant resins employed.

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:

Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).

- (2) Formulation data or USEPA method 24 (for coatings) shall be used to determine compliance with the styrene content limitation in c)(1).
- (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.

g) Miscellaneous Requirements

- (1) None.



4. P003, Custom Marble Casting

Operations, Property and/or Equipment Description:

Custom Marble Casting Line No. 1

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. d)(2).

(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. b)(1)b.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year. See c)(1).
b.	OAC rule 3745-31-05(D)	See section B.2.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit and compliance with the styrene content.

c) Operational Restrictions

(1) The styrene content of the resins employed in emissions unit P003 shall not exceed 33% by weight.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions unit P003:
 - 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 VOC content of each liquid organic material, in pounds per gallon or the styrene content percent by weight of each organic material, whichever is applicable..
 - d. The total monthly VOC emission rate for all liquid organic materials, in pounds of VOC emitted per month. To determine emissions from resins used for marble casting, multiply the pounds used by 0.03* then times the styrene content/100.

* Emission Factor taken from AP-42 Fifth Edition, February 2007, Table 4.4 – 2 Emission Factors for Uncontrolled Polyester Product Fabrication Processes.

The monthly VOC emission rates shall be summarized at the end of the year to demonstrate compliance with the annual VOC emissions limitation.

- (2) The permit to install and operate (PTIO) for emissions unit P003 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

- (3) For HAPs recordkeeping requirements refer to Section B.3.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. HAPs emission deviations as outlined in Section B.4.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the following information:
 - a. The total VOC emissions for the calendar year.
 - b. An identification of each day during which the styrene content of resins employed exceeded 33% by weight and the actual styrene content of the non-compliant resins employed.

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:

Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).

- (2) Formulation data or USEPA method 24 (for coatings) shall be used to determine compliance with the styrene content limitation in c)(1).
- (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.

g) Miscellaneous Requirements

- (1) None.



5. R001, Standard Laminate Operation

Operations, Property and/or Equipment Description:

Standard Laminate Operation

- 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. d)(2).
 - (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. b)(1)b., c)(2), d)(1)d, d)(1)e. and e)(2).
- 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)	Volatile Organic Compound (VOC) emissions shall not exceed 16.23 pounds per hour. The pound per hour VOC emission limitation is based on the emissions unit's potential to emit. Therefore no hourly record keeping requirements, reporting or compliance measures are required.
b.	OAC rule 3745-31-05(D)	The total combined VOC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling, 12-month summation. See section B.2. , c)(1) and c)(2).



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit and compliance with the VOC content and material usage restrictions.

c) Operational Restrictions

- (1) The VOC content of the adhesive materials employed in emissions unit R001 and R002 shall not exceed 5.41 pounds of VOC per gallon of adhesive.
- (2) The total combined annual adhesive usage for emissions units R001 and R002 shall not exceed 4436 gallons based upon a rolling, 12-month summation of the adhesive usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions unit R001:
 - a. The company identification for each liquid organic material (adhesive) employed in this emissions unit.
 - b. The VOC content of each liquid organic material, as applied, in pounds per gallon.
 - c. The total combined adhesive usage for emissions units R001 and R002.
 - d. The rolling 12-month summation of the adhesive usage totals for emissions units R001 and R002.
 - e. The rolling 12-month summation of the VOC emissions totals for emissions units R001 and R002.
- (2) The permit to install and operate (PTIO) for emissions unit R001 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.23



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3646

MAGLC (ug/m3): 4476

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

- (3) For HAPs recordkeeping requirements refer to Section B.3.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. HAPs emission deviations as outlined in Section B.4.
- ii. Any deviations from the rolling 12-month adhesive usage outlined in c)(2).
- iii. Any deviations from the rolling 12-month VOC emission rate outlined in b)(1)b.

- b. the probable cause of each deviation (excursion);

- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.



The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the following information:
 - a. An identification of each day during which the VOC content requirements of 5.41 pounds of VOC per gallon of adhesive was exceeded, and the actual VOC content for each such day.
 - b. The total VOC emissions for the calendar year from this emissions unit.
- 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:

The total combined VOC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).
 - b. Emission Limitation:

The VOC content of the adhesive materials employed in emissions unit R001 and R002 shall not exceed 5.41 pounds of VOC per gallon of adhesive.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) shall be used to determine compliance with the VOC content limitation in c)(1).
 - (2) Compliance with the usage limitation in c)(2) shall be determined by the records in d)(1).
 - (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.
- g) Miscellaneous Requirements
 - (1) None.



6. R002, Custom Laminate Operation

Operations, Property and/or Equipment Description:

Custom Laminate Operation

- 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. d)(2).
 - (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. b)(1)b., c)(2), d)(1)d, d)(1)e. and e)(2).
- 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)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 16.23 pounds per hour.</p> <p>The pound per hour VOC emission limitation is based on the emissions unit's potential to emit. Therefore no hourly record keeping requirements, reporting or compliance measures are required.</p>
b.	OAC rule 3745-31-05(D)	<p>The total combined VOC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling, 12-month summation.</p> <p>See section B.2. , c)(1) and c)(2).</p>



- (2) Additional Terms and Conditions
 - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit and compliance with the VOC content and material usage restrictions.
- c) Operational Restrictions
 - (1) The VOC content of the adhesive materials employed in emissions unit R001 and R002 shall not exceed 5.41 pounds of VOC per gallon of adhesive.
 - (2) The total combined annual adhesive usage for emissions units R001 and R002 shall not exceed 4436 gallons based upon a rolling, 12-month summation of the adhesive usage figures.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for emissions unit R002:
 - a. The company identification for each liquid organic material (adhesive) employed in this emissions unit.
 - b. The VOC content of each liquid organic material, as applied, in pounds per gallon.
 - c. The total combined adhesive usage for emissions units R001 and R002.
 - d. The rolling 12-month summation of the adhesive usage totals for emissions units R001 and R002.
 - e. The rolling 12-month summation of the VOC emissions totals for emissions units R001 and R002.
 - (2) The permit to install and operate (PTIO) for emissions unit R002 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.23



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3646

MAGLC (ug/m3): 4476

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

- (3) For HAPs recordkeeping requirements refer to Section B.3.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. HAPs emission deviations as outlined in Section B.4.
- ii. Any deviations from the rolling 12-month adhesive usage outlined in c)(2).
- iii. Any deviations from the rolling 12-month VOC emission rate outlined in b)(1)b.

- b. the probable cause of each deviation (excursion);

- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.



The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the following information:
 - a. An identification of each day during which the VOC content requirements of 5.41 pounds of VOC per gallon of adhesive was exceeded, and the actual VOC content for each such day.
 - b. The total VOC emissions for the calendar year from this emissions unit.
- 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:

The total combined VOC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).
 - b. Emission Limitation:

The VOC content of the adhesive materials employed in emissions unit R001 and R002 shall not exceed 5.41 pounds of VOC per gallon of adhesive.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) shall be used to determine compliance with the VOC content limitation in c)(1).
 - (2) Compliance with the usage limitation in c)(2) shall be determined by the records in d)(1).
 - (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.
- g) Miscellaneous Requirements
 - (1) None.



7. R003, Standard Gel Coat Line

Operations, Property and/or Equipment Description:

Standard Gel Coat Line No. 1

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. d)(2).

(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. b)(1)b.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year.
b.	OAC rule 3745-31-05(D)	See section B.2.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit.

c) Operational Restrictions

(1) The styrene content of the resins employed in emissions unit R003 shall not exceed 46% by weight.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions unit R003:



- 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 VOC content of each liquid organic material, in pounds per gallon or the styrene content percent by weight of each liquid organic material, whichever is applicable..
- d. The total monthly VOC emission rate for all liquid organic materials, in pounds of VOC emitted per month. To determine emissions from the gel coat operations, multiply the pounds used by 20.6 %*.

* Emission Factor taken from CFA Emission Factors Study prepared on 01/15/98, this emission factor is based on a styrene content of 46% by weight.

These records shall be summarized annually to demonstrate compliance with the annual VOC emissions limitation.

- (2) The permit to install and operate (PTIO) for emissions unit R003 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

- (3) For HAPs recordkeeping requirements refer to Section B.3.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. HAPs emission deviations as outlined in Section B.4.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the following information:
 - a. The total VOC emissions for the calendar year.
 - b. An identification of each day during which the styrene content of resins employed exceeded 46% by weight and the actual styrene content of the non-compliant resins employed.

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:

Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).

- (2) Formulation data or USEPA method 24 (for coatings) shall be used to determine compliance with the styrene content limitation in c)(1).
- (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.

g) Miscellaneous Requirements

- (1) None.



8. R004, Custom Gel Coat Line

Operations, Property and/or Equipment Description:

Custom Gel Coat Line No. 1

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. d)(2).

(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. b)(1)b.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year.
b.	OAC rule 3745-31-05(D)	See section B.2.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitation established in this permit.

c) Operational Restrictions

(1) The styrene content of the resins employed in emissions unit R004 shall not exceed 46% by weight.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions unit R004:



- 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 VOC content of each liquid organic material, in pounds per gallon or the styrene content percent by weight of each liquid organic material, whichever is applicable..
- d. The total monthly VOC emission rate for all liquid organic materials, in pounds of VOC emitted per month. To determine emissions from the gel coat operations, multiply the pounds used by 20.6 %*.

* Emission Factor taken from CFA Emission Factors Study prepared on 01/15/98, this emission factor is based on a styrene content of 46% by weight.

These records shall be summarized annually to demonstrate compliance with the annual VOC emissions limitation.

- (2) The permit to install and operate (PTIO) for emissions unit R004 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,202

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2025.7

MAGLC (ug/m3): 2028.6

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 and operate 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 and operate 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.

* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."

- (3) For HAPs recordkeeping requirements refer to Section B.3.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. HAPs emission deviations as outlined in Section B.4.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include in the annual Permit Evaluation Report (PER) the following information:
 - a. The total VOC emissions for the calendar year.
 - b. An identification of each day during which the styrene content of resins employed exceeded 46% by weight and the actual styrene content of the non-compliant resins employed.

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:

Volatile Organic Compound (VOC) emissions shall not exceed 7.0 tons per year.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by the record keeping specified d)(1).

- (2) Formulation data or USEPA method 24 (for coatings) shall be used to determine compliance with the styrene content limitation in c)(1).
- (3) Compliance with HAPs emissions limitations in B.2. shall be demonstrated by the record keeping in B.3.

g) Miscellaneous Requirements

- (1) None.