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Facility Name: **Moellering Industries Inc**

Application Number: **14-4558**

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

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

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

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BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
F001	Sawing, grinding, and finishing operation	Visible emissions limitations, full enclosure	3745-17-07	See Term A.4.
			3745-17-08	See Term B.4.
			3745-31-05	228 pounds/week, 5.9 TPY PM
				72.96 pounds/week, 1.89 TPY PM ₁₀
			3745-15-07	See General Terms
P001	Finishing operation	Emission limitations	3745-31-05	See Term A.1.
			3745-21-07 (G)	8 pounds/hour, 40 pounds/day, and 7.3 TPY OC
			3745-15-07	See General Terms
P002	Standard marble casting	Emission limitations	3745-31-05	See Term A.1.
			3745-21-07 (G)	8 pounds/hour, 40 pounds/day, and 7.3 TPY OC
			3745-15-07	See General Terms

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P003	Custom marble casting	Emission limitations	3745-31-05	See Term A.1.
			3745-21-07 (G)*	8 pounds/hour, 40 pounds/day, and 7.3 TPY OC
			3745-15-07	See General Terms
R001	Standard laminate operation	OC content limitation and usage limitation	3745-31-05	76.08 pounds/hour OC; annual limit for R001 and R002 combined = 63.03 TPY OC
			3745-15-07	See General Terms
			3745-21-07 (G)*	Less stringent than BAT
R002	Custom laminate operation	OC content limitation and usage limitation	3745-31-05	76.08 pounds/hour OC; annual limit for R001 and R002 combined = 63.03 TPY OC
			3745-15-07	See General Terms
			3745-21-07 (G)*	Less stringent than BAT
R003	Standard gel coat	Emission limitations	3745-31-05	See Term A.1.
			3745-21-07 (G)	8 pounds/hour, 40 pounds/day, and 7.3 TPY OC
			3745-15-07	See General Terms

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R004	Custom gel coat	Emission limitations	3745-31-05	See Term A.1.
			3745-21-07 (G)	8 pounds/hour, 40 pounds/day, and 7.3 TPY OC
			3745-15-07	See General Terms

* The emission limitation established by this rule is less stringent than those established in OAC rule 3745-31-05(BAT).

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	99.53
PM	5.9
PM ₁₀	1.89

REPORTING REQUIREMENTS

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

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

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

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions and/or Control Requirements

1. The maximum emissions from the specified emissions units shall not exceed the following:

R001 & R002:	76.08 lbs/hr each and 63.03 TPY OC combined
R003:	8.0 lbs/hr, 40 lbs/day, and 7.3 TPY OC
R004:	8.0 lbs/hr, 40 lbs/day, and 7.3 TPY OC
P001:	8.0 lbs/hr, 40 lbs/day, and 7.3 TPY OC
P002:	8.0 lbs/hr, 40 lbs/day, and 7.3 TPY OC
P003:	8.0 lbs/hr, 40 lbs/day, and 7.3 TPY OC
F001:	228 lbs/week and 5.9 TPY PM*; 72.96 lbs/week and 1.89 TPY PM ₁₀ *

* This is based upon potential emission and therefore records and compliance methods are not necessary.

2. The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall 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 determined on a rolling, 12-month summation.
3. The OC emissions from the adhesive materials employed in emissions units R001 and R002 shall not exceed 5.41 pounds of OC per gallon of adhesive.

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4. Visible particulate emissions from emissions unit F001 shall not exceed 20 percent opacity, as a three-minute average, except by rule.

B. Operational Restrictions

1. The maximum hourly adhesive usage for emissions units R001 and R002 is based on the maximum capacity of the equipment.
2. The maximum annual adhesive usage for emissions units R001 and R002 combined shall not exceed 23,300 gallons. Compliance with the above usage limitation shall be determined based upon a rolling, 12-month summation. The permittee has existing records in lieu of monthly gallon usage limitation.
3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited in emissions units R001 and R002.
4. Sawdust shall be collected and stored inside the building or, if outside, stored only in closed containers.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for each emissions units R003, R004, P001, P002, and P003:
 - a. the company identification for each liquid organic material employed;
 - b. a determination of whether the liquid organic material is photochemically reactive;
 - c. the number of gallons or pounds of each liquid organic material employed;
 - d. the organic compound content (in pounds per gallon) or the styrene percentage of each liquid organic material, whichever is applicable;
 - e. the total organic compound emission rate for all liquid organic materials, in pounds of OC emitted per day. (To determine emissions from the gel coat operations, multiply the pounds of gel coat used by 0.52 then times the styrene content/100. To determine emissions from resins used for marble casting, multiply the pounds used by 0.03 then

- times the styrene content/100. All other OC emissions shall be determined by multiplying the OC content by the gallons of liquid organic material employed);
- f. the total number of hours the emissions unit was in operation; and,
 - g. the average hourly organic compound emission rate for all liquid organic materials, i.e., (e)/(f), in pounds per hour (average) for each of the emissions units.
2. The permittee shall record the amount of sawdust collected each week.
 3. The permittee shall collect and record the following information each month for emissions units R001 and R002:
 - a. the company identification for each liquid organic material employed;
 - b. a determination of whether the liquid organic material is photochemically reactive;
 - c. the organic compound content (in pounds per gallon) of each liquid organic material;
 - d. the number of gallons of each liquid organic material employed in emissions units R001 and R002 combined; and,
 - e. the updated rolling, 12-month summation of the number of gallons of each type of liquid organic material used in emissions units R001 and R002 combined. This shall include the information for the current month and the preceding eleven calendar months.
 4. The permittee shall collect and record the following information each month for the entire facility:
 - a. the company identification for each liquid organic material employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied;

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- c. the total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)];
- d. the number of gallons of each liquid organic material employed;
- e. the total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material];
- f. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
- g. the total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material]; and,
- h. the updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Monthly HAP records may be kept on a facility-wide basis.

5. Each record and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from emissions units R003, R004, P001, P002, or P003 exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

- b. an identification of each day during which the organic compound emissions from emissions units R003, R004, P001, P002, or P003 exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. an identification of each day during which the OC content requirements in Additional Special Term and Condition A.3 of these terms was exceeded, and the actual OC content for each such day; and,
 - d. an identification of each month during which the adhesive usage limitation in Additional Special Term and Condition B.2 of these terms was exceeded, and the actual adhesive usage for the 12-month period.
2. The permittee shall also submit annual reports which:
- a. identify each day during which any photochemically reactive material was employed in emissions unit R001 or R002. This report shall identify the cause for the use of the photochemically reactive material and the estimated total quantity of the material emitted each such day; and,
 - b. specify the total organic compound emissions from each emissions unit and the total emissions of HAPs from the facility for the previous calendar year.

These reports shall be submitted by January 31 of each year.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall submit required reports in the following manner:
- a. reports required by item D.1. of this permit shall be submitted to the Hamilton County Dept. of Env. Services; and,

- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken (as required by item D.1. of this permit), shall be submitted to the Hamilton County Dept. of Env. Services.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

E. Compliance Methods/Testing Requirements

1. Compliance with the OC, PM, and HAP emission limitations in Sections A.1. and A.2. of these terms and conditions shall be demonstrated by the required records and reports.
2. Compliance with the OC content limitation in Section A.3. of these terms and conditions shall be demonstrated by the required recordkeeping.
3. Compliance with the visible particulate emission limitation in Section A.4 of these terms and conditions shall be demonstrated by OAC rule 3745-17-03(B)(3).
4. Compliance with the usage limitation in Section B.2. of these terms and conditions shall be demonstrated by the required records and reports.
5. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.