Statement of Basis For Title V Permit

Part I - General	
Company Name	Nisbet Brower Marble, LLC
Premise Number	1431404135
What makes this facility a Title V facility?	Individual HAP (styrene)emissions greater than 10 TPY
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.	N	Y	The permittee shall comply with the applicable requirements of 40 CFR 63, Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) as specified in Attachment A of this permit.

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)																
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.																
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P001	6.06lbs OC / hr from resins	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM OR - The hourly OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the hourly limit. M&R - The amount and styrene content of resins employed, the emission factor, and hours of operation are tracked on a daily basis. This allows for the hourly OC emissions to be directly calculated. Rp - Deviation reports for hourly and daily OC limits are included in this Title V permit. ET - No emission testing is required; the emissions are calculated on a daily basis.	

	40 lbs OC / hr from resins	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the daily limit. M&R - The amount and styrene content of resins employed and the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated. Rp - Deviation reports for hourly and daily OC limits are included in this Title V permit. ET - No emission testing is required; the emissions are calculated on a daily basis.
	7.3 TPY OC from resins	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM OR - The OC emission rates are calculated on a daily basis. No OR is required to ensure the EU is in compliance with the annual limit. M&R - The amount and styrene content of resins employed and the emission factor are tracked on a daily basis. This allows for the annual OC emissions to be directly calculated by summing the daily emission totals. Rp - An annual report for the OC emission from the resins employed is required. ET - No emission testing is required; the emissions are calculated on a daily and annual basis.
	974.6 lbs OC / month from cleanup materials employed	N	Y OAC 31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. OR - Usage and OC content limits are used to limit monthly OC emissions. M&R and Rp requirements are specified in the permit. CAM is not applicable. M&R - The amount and OC content of cleanup materials employed in P001 are tracked on a monthly basis. Rp - Deviation reports for monthly OC limits are present. ET - No emission testing is required, the emissions are calculated on a monthly basis.

	5.85 TPY OC from cleanup materials employed	N	Y OAC 31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. OR - Usage and OC content limits are used to limit monthly and annual OC emissions. Monthly emissions are summarized year-to-date. M&R and Rp requirements are specified in the Title V permit. CAM is not applicable. M&R - The amount and OC content of cleanup materials employed in P001 are tracked on a monthly basis. This allows for the monthly OC emissions to be summarized for an annual emissions rate. Rp - An annual report for cleanup material is specified in this Title V permit. ET - No emission testing is required; the emissions are calculated on a monthly and annual basis.
R001	5.52 lbs OC/hour from gel coat	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR - The hourly OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the hourly limit. M&R - The amount and styrene content of gelcoat employed, the emission factor, and hours of operation are tracked on a daily basis. This allows for the hourly OC emissions to be directly calculated. Rp - Deviation reports for hourly and daily OC limits are included in this Title V permit. ET - No emission testing is required; the emissions are calculated on a daily basis.
	40 lbs. OC/day from gel coat	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the daily limit. M&R - The amount and styrene content of gelcoat employed and the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated. Rp - Deviation reports for daily OC limits are included in this Title V permit. ET - No emission testing is required; the emissions are calculated on a daily basis.

	7.3 TPY OC from gel coat	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the daily limit. M&R - The amount and styrene content of gel coats employed and the emission factor are tracked on a daily basis. This allows for the annual OC emissions to be directly calculated by summing the daily emission totals. Rp - An annual report for the OC emission from the gel coats employed is required. ET - No emission testing is required; the emissions are calculated on a daily and annual basis.
	178 lbs OC/month from cleanup	N	Y OAC 31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI.All requirements have been transferred from the PTI. OR - The OC emission rates are calculated monthly, based on usage and OC content limits. M&R and Rp requirements are specified in the permit. This emission unit is not subject to CAM. M&R - The amount and OC content of cleanup materials employed in R001 are tracked on a monthly basis. This allows for the OC emissions to be directly calculated on a monthly basis. Rp - Deviation reports for cleanup usage & OC emissions limits are present. ET - No emission testing is required, the emissions are calculated on a monthly basis.
	0.86 TPY OC from cleanup	N	Y OAC 31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. OR - Usage and OC content limits The OC emission rates are calculated monthly, based on. Monthly emissions are summarized for the year. M&R and Rp requirements are specified in the Title V permit. CAM is not applicable. M&R - The amount and OC content of cleanup materials employed in R001 are tracked on a monthly basis. This allows for the monthly OC emissions to be summarized for an annual emissions rate. Rp - An annual report for OC is specified in this Title V permit. ET - No emission testing is required; the emissions are calculated on a monthly and annual basis.

	20 % opacity as a six minute average	Y OAC 17-07(A)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	This emission unit is not subject to CAM. OR- No OR is required, the latest CFA guidance indicates the transfer efficiency in the gelcoat process is 99%+. Therefore very little PE is emitted. During facility inspections no stack or fugitive visible emission have ever been detected. M&R- See OR for explanation as to why no monitoring is required Rp- See OR for explanation as to why no reporting is required. ET- See OR for explanation as to why no testing is required
	0.551 lb PE/ hour	Y OAC 17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	This emission unit is not subject to CAM. OR- No OR is required; The hourly limit is greater than this EU's potential to emit. M&R- See OR for explanation as to why no monitoring is required Rp- See OR for explanation as to why no reporting is required. ET- See OR for explanation as to why no testing is required.
	2.41 TPY PE	N	Y OAC 31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR- No OR is required; The annual limit is based on 8760 hours per year. M&R- See OR for explanation as to why no monitoring is required Rp- See OR for explanation as to why no reporting is required. ET- See OR for explanation as to why no testing is required.
R002	5.52 lbs OC/hour from gel coat	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR - The hourly OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the hourly limit. M&R - The amount and styrene content of gelcoat employed, the emission factor, and hours of operation are tracked on a daily basis. This allows for the hourly OC emissions to be directly calculated. Rp - Deviation reports for hourly and daily OC limits are included in this Title V permit. ET - No emission testing is required; the emissions are calculated on a daily basis.

	40 lbs. OC/day from gel coat	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the daily limit. M&R - The amount and styrene content of gelcoat employed and the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated. Rp - Deviation reports for daily OC limits are included in this Title V permit. ET - No emission testing is required; the emissions are calculated on a daily basis.
	7.3 TPY OC from gel coat	N	Y OAC 31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the daily limit. M&R - The amount and styrene content of gel coats employed and the emission factor are tracked on a daily basis. This allows for the annual OC emissions to be directly calculated by taking a summation of the daily emission totals. Rp - An annual report for the OC emission from the resins employed is required. ET - No emission testing is required; the emissions are calculated on a daily and annual basis.
	178 lbs OC/month from cleanup	N	Y OAC 31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. All requirements have been transferred from the PTI. OR - Usage and OC content limits are used to limit monthly OC emissions from cleanup. M&R and Rp requirements are specified in the permit. This emission unit is not subject to CAM. M&R - The amount and OC content of cleanup materials employed in R002 are tracked on a monthly basis. This allows for the OC emissions to be directly calculated on a monthly basis. Rp - Deviation reports for cleanup usage & OC emissions limits are present. ET - No emission testing is required, the emissions are calculated on a monthly basis.

	0.86 TPY OC from cleanup	N	Y OAC 31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements have been transferred from the PTI. OR - The OC emission rates are calculated monthly, based on usage and OC content limits. Monthly emissions are summarized year-to-date. M&R and Rp requirements are specified in the Title V permit. CAM is not applicable. M&R - The amount and OC content of cleanup materials employed in R002 are tracked on a monthly basis. This allows for the monthly OC emissions to be summarized for an annual emissions rate. Rp - An annual report for OC is specified in this Title V permit. ET - No emission testing is required; the emissions are calculated on a monthly and annual basis.
	20 % opacity as a six minute average	Y OAC 17-07(A)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	This emission unit is not subject to CAM. OR- No OR is required; the latest CFA guidance indicates the transfer efficiency in the gelcoat process is 99%+. Therefore very little PE is emitted. During facility inspections no stack or fugitive visible emission have ever been detected. M&R- See OR for explanation as to why no monitoring is required Rp- See OR for explanation as to why no reporting is required. ET- See OR for explanation as to why no testing is required
	0.551 lb PE/ hour	Y OAC 17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	This emission unit is not subject to CAM. OR- No OR is required; The hourly limit is greater than this EU's potential to emit. M&R- See OR for explanation as to why no monitoring is required Rp- See OR for explanation as to why no reporting is required. ET- See OR for explanation as to why no testing is required.
	2.41 TPY PE, based on 8760 hours	N	Y OAC 31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	All requirements have been transferred from the PTI. This emission unit is not subject to CAM. OR- No OR is required; The annual limit is based on 8760 hours per year. M&R- See OR for explanation as to why no monitoring is required Rp- See OR for explanation as to why no reporting is required. ET- See OR for explanation as to why no testing is required.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not <u>all</u> of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

  Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

    1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
    2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the

"Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.

3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.