



STATEMENT OF BASIS
BAQ Engineering Services Division

2600 Bull Street, Columbia, S.C. 29201
Phone: 803-898-4123 Fax: 803-898-4079

PROJECT/PROPOSAL NAME: Parthenon Marble Products, Inc.	ENGINEER ASSOCIATE: Utpal B. Patel
LOCATION (STREET, CITY): 106 Interstate Boulevard - Greenville	DATE: DRAFT Page 1 of 4
PERMIT NUMBER: 1200-0260 – Conditional Major Renewal	
SIC/NAIC CODE(S): 3281/327991	

DATE APPLICATION RECEIVED: July 01, 2009

FACILITY DESCRIPTION: This facility is a custom manufacturer of cultured marble, onyx, and granite products; lavatories, tubs, showers, whirlpools, etc.

TYPE OF PERMIT RENEWAL (Check Which Applies)		ISSUE AND EXPIRATION DATE OF EXISTING PERMIT	
Conditional Major Permit	X	Issue Date Of Last Permit	8/30/2004
Part 70 (TV) Permit			
State (Minor) Operating Permit		Expiration Date of Last Permit	9/30/2009

DATE OF LAST INSPECTION: March 30, 2009 – No Violations were observed.

CHANGES SINCE LAST CM ISSUED: There is no change.

DESCRIPTION OF EACH EMISSION SOURCE AT FACILITY

OP ID	CP ID	Equip ID	Equipment Description	Installation Date	Modification Date	Control Device ID	Stack ID
01	-	01	Gel Coating and Oven	1986	N/A	S1	S1
02	-	02	Marble Mixing/Mold Setting	1986	N/A	N/A	S2
03	-	03	Grinding and Polishing Area A and B	1988	N/A	S3,S4	S3,S4

DESCRIPTION OF EACH CONTROL EQUIPMENT AT FACILITY

Control Device ID	Control Device Description	Installation Date	Pollutant(s) Controlled	Efficiency Capture	Efficiency Removal
S1	Dry Filter	1986	PM/PM10	100%	95%
S3	Dust Collection Unit in Area A (filter and inertial impaction system) - It is located along the backwall of this room. It is essentially a rectangular exhaust plenum with a series of regular air filters along the front side for removal of any larger particulate matter that may be generated. Any smaller particulates that pass through the air filters are removed by impacting on the backwall and falling to the bottom of the plenum. The clean air is exhausted upward through two stacks.	1988	PM/PM10	90%	75%
S4	Two Dust Collectors in Area B (Vent Indoors) - The first dust collection unit consists of a small cyclone followed by a single bag filter. The second dust collection unit is a small baghouse.	1995	PM/PM10	100%	95%

DESCRIPTION OF EACH EXEMPT SOURCE/INSIGNIFICANT ACTIVITY AT FACILITY

Equip ID	Source Description (Exemption Date)	Basis
A	4,500 gallon capacity storage tank used to store unsaturated polyester resin used in mixing and blending process. (March 23, 1998).	Styrene (VOC) emission < 1000 lb/month
B	4,500 gallon capacity storage tank used to store unsaturated polyester resin used in mixing and blending process. (March 23, 1998).	Styrene (VOC) emission < 1000 lb/month



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POTENTIAL EMISSIONS PER EMISSION SOURCE AT FACILITY

OP ID	Pollutant (Including each Single HAP and Total HAPs)	Uncontrolled Emissions		Controlled Emissions	
		lb/hr	TPY@ 8760 hours	lb/hr	TPY@ 8760 hours
01	PM/PM ₁₀	1.57	6.88	0.079	0.344
01	Dimethyl Phthalate	0.01	0.023	N/A	N/A
01	Methyl Methacrylate	0.98	4.3	N/A	N/A
01	Styrene	2.88	12.6	N/A	N/A
01	VOC	6.46	28.3	N/A	N/A
02	PM/PM ₁₀	0.51	2.23	N/A	N/A
02	Dimethyl Phthalate	0.10	0.42	N/A	N/A
02	Methyl Methacrylate	1.603	7.022	N/A	N/A
02	Styrene	2.566	11.24	N/A	N/A
02	VOC	4.27	18.70	N/A	N/A
03	PM/PM ₁₀	0.51	2.23	0.13	0.56

FACILITY-WIDE POTENTIAL EMISSIONS

Pollutant (Including each Single HAP and Total HAPs)	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	TPY@ 8760 hours	lb/hr	TPY@ 8760 hours
PM/PM ₁₀	2.59	11.34	0.72	3.134
Dimethyl Phthalate	0.10	0.443	N/A	N/A
Methyl Methacrylate	2.583	29.22	N/A	N/A
Styrene	5.446	23.85	N/A	N/A
VOC	10.73	46.99	N/A	N/A

PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments
	Yes	No	
South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)			
Section II(E): Synthetic Minor		X	The facility has taken a facility-wide federally enforceable limit of less than 60,000 lb/yr of Gel Coat usage and 1,080,000 lb/yr of Unsaturated Polyester Resin with a maximum Styrene Content of 40% by weight to stay below 10/25 tpy of Individual/Aggregate HAPs and apply for Conditional Major permit.
Section II(G): Conditional Major	X		The facility has taken a facility-wide federally enforceable limit of less than 60,000 lb/yr of Gel Coat usage and 1,080,000 lb/yr of Unsaturated Polyester Resin with a maximum Styrene Content of 40% by weight to stay below 10/25 tpy of Individual/Aggregate HAPs and apply for Conditional Major permit.
Standard 1: Fuel Burning Operations		X	This facility has no fuel burning sources.
Standard 2: Ambient Air Quality Standards	X		This facility has demonstrated compliance through modeling; see modeling summary dated 8/18/09. No operational restriction has been established to ensure compliance with the modeled emission rates.
Standard 3: Waste Combustion/Reduction (state only)		X	No waste combustion and reduction process.
Standard 3.1: HMI Waste Incinerators		X	No Medical Waste is burned.



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PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
Standard 4: Emissions from Process Industries	X		I.Ds. 1-3 – Opacity limit is 20%. 01 - Particulate matter allowable rate of 0.877 lb/hr is based on process weight rate of 0.10 tph 02 - Particulate matter allowable rate of 1.689 lb/hr is based on process weight rate of 0.266 tph (Cultured Parstone Casting) 02 - Particulate matter allowable rate of 1.602 lb/hr is based on process weight rate of 0.246 tph (Cultured Marble Casting) 03 - Particulate matter allowable rate of 1.64 lb/hr is based on process weight rate of 0.255 tph
Standard 5: Volatile Organic Compounds		X	None of the processes, which are regulated by the regulation, apply. Potential VOC emissions < 550 lbs/day or 150 lbs/hr.
Standard 5.1: BACT/LAER For VOC (state only)		X	The facility does not have the PTE of 100 tpy of VOCs.
Standard 5.2: Control of Oxides of Nitrogen		X	This facility has no fuel burning source >10 Million Btu/hr heat input.
Standard 7: Prevention of Significant Deterioration		X	The facility's PTE for any pollutant is less than 250 tpy; therefore the facility is not major for PSD. Additionally, the facility does not contain any emission sources that are subject to any Synthetic Minor Emission Limitations.
Standard 7(c): Ambient Air Increments		X	There are baseline dates established for PM10 (07/03/01), SO ₂ (07/03/01) and NO _x (07/18/1995) for Greenville County. All sources within facility, emitting subject pollutants, were constructed prior to the minor source baseline date for Greenville County. See modeling summary Dated 8/18/09 .
Standard 7.1: Standards for Non Attainment Areas		X	The facility is in attainment area.
Standard 8: Toxic Air Pollutants (state only)	X		This facility has demonstrated compliance through modeling for all TAPs, see modeling summary dated 8/18/09.
Regulation 61-62.6: Control of Fugitive Particulate Matter		X	No fugitive PM is emitted.
Regulation 61-62.60: SC Designated Facility Plan and NSPS		X	This facility does not contain sources subject to any NSPS standards.
Regulation 61-62.61: NESHAP		X	This facility does not contain any processes/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
Regulation 61-62.63: NESHAP For Source Categories		X	This facility has taken federally enforceable permit limits to avoid being major source for HAPs. The facility is not subject to Subpart WWWW (Reinforced Plastic Composite Production MACT).
Regulation 61-62.68: Chemical Accident Prevention		X	The facility does not store any listed Chemical above threshold quantity.
Regulation 61-62.70: Title V		X	The facility has taken a facility-wide federally enforceable limit of less than 60,000 lb/yr of Gel Coat usage and 1,080,000 lb/yr of Unsaturated Polyester Resin with a maximum Styrene Content of 40% by weight to stay below 10/25 tpy of Individual/Aggregate HAPs and apply for Conditional Major permit.
Regulation 61-62.72: Acid Rain		X	Not subject to Acid Rain Regulation.
Regulation 61-62.96: Nitrogen Oxides (NO _x) Budget Trading Program		X	No NO _x Trading.



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PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
Regulation 61-62.99: Nitrogen Oxides (NO _x) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	No Kiln
Other		X	None
Federal Regulations (PROJECT ONLY)			
NSPS (Part 60) Subpart(s)		X	This facility does not contain sources subject to any NSPS standards.
NESHAP (Part 61) Subpart(s)		X	This facility does not contain any processes/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
MACT (Part 63) Subpart(s)		X	This facility has taken federally enforceable permit limits to avoid being major source for HAPs. The facility is not subject to Subpart WWWW (Reinforced Plastic Composite Production MACT).
Area Source MACT (Part 63) Subpart(s)		X	The facility does not have any area source categories.
Compliance Assurance Monitoring (CAM) (Part 64)	X		Not a Title V permit.
Other		X	None

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.