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

8/30/2013

Certified Mail

CHAD YODER
ProVia Walnut Creek Facility
2150 State Route 39
Sugarcreek, OH 44681

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000159
Permit Number: P0104759
Permit Type: Renewal
County: Holmes

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 Ohio EPA DAPC, Northeast District Office at (330)425-9171or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
ProVia Walnut Creek Facility

Facility ID:	0238000159
Permit Number:	P0104759
Permit Type:	Renewal
Issued:	8/30/2013
Effective:	8/30/2013
Expiration:	3/1/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
ProVia Walnut Creek Facility

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Authorization

Facility ID:	0238000159
Application Number(s):	A0037198
Permit Number:	P0104759
Permit Description:	PTIO renewal permit for P001: door assembly with rigid polyurethane foaming process no. 1.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	8/30/2013
Effective Date:	8/30/2013
Expiration Date:	3/1/2018

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ProVia Walnut Creek Facility
2150 State Route 39
Sugarcreek, OH 22740

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:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0104759
Permit Description: PTIO renewal permit for P001: door assembly with rigid polyurethane foaming process no. 1.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	P001
Superseded Permit Number:	02-22831
General Permit Category and Type:	Not Applicable

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 takenby 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 Ohio EPA DAPC, Northeast District Office 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 submitting[1] 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.

[1]Permittees 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.

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) None.

C. Emissions Unit Terms and Conditions

1. P001, P001

Operations, Property and/or Equipment Description:

Door assembly with a rigid polyurethane foam process 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. 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)	The emissions of organic compounds (OCs) shall not exceed 30.12 lbs./hour, as a monthly average, and 131.9 tons/year.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for the materials employed in this emissions unit:

a. the name and identification of each polyurethane mixture and each cleanup material, as employed;

b. the mass of each polyurethane mixture, as employed, in pounds;

c. the factor of blowing agent emissions (e.g. HFC-245a), in lbs. HFC emissions per lb. rigid polyurethane produced

d. the number of gallons of each cleanup material employed;

e. the OC content of each cleanup material employed, in pounds per gallon, excluding water;

f. the actual hours of operation;

g. the total OC emissions, in pounds, calculated in accordance with the equation(s) specified in f)(1); and

h. the average, hourly OC emissions, , i.e., the sum of d)(1)g. divided by d)(1)f.

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

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 e-Business 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. The report shall identify of the following for this emissions unit:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that have been detected by the monitoring, record keeping and/or testing requirements in this permit: any monthly record showing that the hourly OC emissions, as a monthly average, exceeds the applicable limitation in b)(1)a.

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 year, the permittee shall submit a report that states that no deviations (excursions) occurred during the 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

The OC emissions shall not exceed 30.12 lbs./hour, as a monthly average.

Applicable Compliance Method

Compliance may be based on the following equation(s):

i. Determination of the OC emissions from the blowing agent (e.g. HFC-245a also known as 1,1,1,3,3-pentaflouropropane):

$OC_{HFC} = EF_OC_{HFC} \times M_{POLYURETHANE}$.

OR $OC_{HFC} = EF_OC_{HFC} \times V_{POLYURETHANE}$.

Where:

OC_{HFC} = the OC emissions from the blowing agent, in pounds per month.

EF_OC_{HFC} = the OC emissions factor for blowing agent emissions, which is 0.0501 lbs. HFC/lb. polyurethane, as specified in the application for this PTIO. This emissions factor will need to be re-evaluated should the polyurethane mix formulation change.

$M_{POLYURETHANE}$ = the mass of polyurethane mixture(s), as employed, recorded as required in d)(1)b., in pounds/month.

ii. Determination of the OC emissions from the cleanup operation:

$OC_{CLEANUP} = V_{CLEANUP} \times C_{OC}$.

Where:

$OC_{CLEANUP}$ = the OC emissions from the cleanup operation, in lbs. per month.

$V_{CLEANUP}$ = the volume of cleanup material(s), as employed, recorded as required in d)(1)d., in gallons/month.

C_{OC} = the OC content of the cleanup material, recorded as required in d)(1)e., in lbs. OC/gallon.

iii. Determination of the OC/VOC emissions, as diphenylmethane-4,4'-diisoncyanate (MDI) from equipment leaks:

$L_{fg} = C_{mdi}/1{,}000{,}000 \times (V_B/359) \times N_{YEAR} \times (273.15/T_{AMB}) \times M_W \times K_f$.

Where:

L_{fg} = the fugitive emissions, in lbs./year as estimated from the MDI Emissions Estimator v. 3.0 Software, distributed by the Alliance for Polyurethanes Industry, and was estimated to be 146.7 lbs./year. This emissions estimate will need to be re-evaluated should the work conditions change.

C_{mdi} = the average MDI concentration in the air within the building, which is 0.003 ppmv.

V_B = the air volume of the workspace within the building, which is 1,562,275 cubic feet (cf).

359 = the molar volume of an ideal gal in cf/lb-mole at 0^oC and 1-atmosphere.

N_{YEAR} = number of air exchanges per year is based on average of 5 per hour which results in 43,800 per year.

T_{AMB} = ambient temperature in K, based on an ambient temperature of 70^oF (21.1^oC), 294.26^oK.

M_W = the molecular weight of diphenylmethane-4, 4'-diisocyanate (MDI), 250.26 gram/mole.

K_f = the adjustment factor for the MDI concentration in the building air is 1.10, based on a factor from API.

iv. Determination of the OC/VOC emissions, as MDI from the polyurethane curing process:

$L_{fd} = V_{AIR} \times (1/359) \times (273.15/T_{PROC}) \times (VP_{MDI}/760) \times M_w \times K_{MDI}$.

Where:

L_{fd} = the emissions from the enclosed process, in lbs./year as estimated from the MDI Emissions Estimator v. 3.0 Software, distributed by the Alliance for Polyurethanes Industry, which was estimated to be 0.004985 lb./year.

V_{AIR} = the annual volume of displaced air in cf/year, which was estimated to be 2,213,627 cf./year.

359 = the molar volume of an ideal gal in cf/lb-mole at 0^oC and 1 atmosphere.

T_{PROC} = the process temperature in K, based on a process temperature of 70°F (21.1°C), 294.26°K.

VP_{MDI} = the vapor pressure of MDI, based on its temperature, which is 6.26×10^{-6} mm Hg.

M_W = the molecular weight of diphenylmethane-4, 4'-diisocyanate (MDI), 250.26 gram/mole.

K_{MDI} = the adjustment factor to the vapor pressure, which is 0.43.

v. Determination of the total OC emissions:

$OC_{TOTAL} = \{OC_{HFC} + OC_{CLEANUP} + (L_{fg} + L_{fd})/12\}/HRS$.

Where:

OC_{TOTAL} = the total OC emissions from all process operations, in lbs./hour, as a monthly average.

HRS = the actual hours of operation, recorded as required in d)(1)f., in hours/month.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A-4, Methods 1 through 4, and Method 18, 21, 24 or 25 or equivalent, alternative method(s), as approved by Ohio EPA.

b. <u>Emission Limitation</u>

The OC emissions rate shall not exceed 131.9 tons/year.

<u>Applicable Compliance Method</u>

Compliance may be determined from the summation of the monthly OC emissions based upon the record keeping requirements specified in d)(1)g., divided by 2,000 lbs. OC/ton OC.

g) Miscellaneous Requirements

(1) The emissions unit at this facility is located in Holmes County and not in any county identified in OAC rule 3745-21-06 and it is not equipped with an emissions control device therefore it is not subject to the requirements of OAC rule 3745-21-07.

(2) The Provia Walnut Creek Facility is an area (minor) source of hazardous air pollutant (HAP) emissions. This emissions unit is not subject to the NESHAP for Flexible Polyurethane Foam Production (40 CFR 63.1290 – 63.1309 and associated tables) nor is it subject to the NESHAP for Flexible Polyurethane Foam Fabrication Operations (40 CFR 63.8780 – 63.8830 and associated tables).

(3) This emissions unit is not subject to the NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR 63.11414 – 63.11420 and associated tables) because rigid polyurethane foam is produced.