



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04566

DATE: 4/29/2004

Dayton Polymeric Products
Jim Hartings
3337 N Dixie Dr
Dayton, OH 45414-5645

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 4/29/2004
Effective Date: 4/29/2004**

FINAL PERMIT TO INSTALL 08-04566

Application Number: 08-04566
APS Premise Number: 0857043129
Permit Fee: **\$1200**
Name of Facility: Dayton Polymeric Products
Person to Contact: Jim Hartings
Address: 3337 N Dixie Dr
Dayton, OH 45414-5645

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3337 N Dixie Dr
Dayton, Ohio**

Description of proposed emissions unit(s):
3 foam molding lines.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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 31, April 30, July 31, and October 31 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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. 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 the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	53.5
Individual HAP	9.9
Combined HAPs	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Polyurethane Foam Molding Cell No. 2 (Line No. 6)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.9 lbs/hour, 37.7 lbs/day and 6.89 tons per year (TPY). See A.2.a
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B). The individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 TPY on a 12 month rolling basis from emissions units P001 and P003. The combined HAP emissions shall not exceed 24.9 tons per year (TPY) on a 12 month rolling basis from emissions units P001 and P003.
	OAC rule 3745-21-07(G)(2)	See A.2.b. The emissions limits established by this rule are less stringent than the

limits established by OAC rule
3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a The 2.9 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

2.b The total allowable usage of HAPs as identified in section 112(b) of Title III of the Clean Air Act from emissions units P001 and P003 (the only emissions units currently emitting HAPs at the facility) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the limitation above shall be based on a rolling, 12-month summation.

B. Operational Restrictions

1. The combined use of coatings and thinning solvents in this emissions unit shall not exceed 5.64 gallons per day.
2. The OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.
3. The individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
4. The maximum coating and thinning solvent usage for this emissions unit shall not exceed 2,060 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating and thinning solvent usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating and Thinning Solvent Usage (gallons)</u>
1	171.67
1-2	343.33
2-3	515.0
3-4	686.67
4-5	858.33

Emissions Unit ID: **P001**

5-6	1,030.0
6-7	1,201.67
7-8	1,373.33
8-9	1,545.00
9-10	1,716.67
10-11	1,888.33
11-12	2,060.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating and thinning solvent usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for emission unit P001:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The OC content of each coating and thinning solvent, in pounds of OC per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total OC emissions from all coatings and thinning solvents applied, in pounds per day, for this emission unit (the sum of b times c for each coating and thinning solvent).

2. The permittee shall collect and record the following information each month for emissions units P001 and P003:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The individual HAP content for each HAP of each coating and thinning solvent in pounds of individual HAP per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total combined HAP content of each coating and thinning solvent in pounds of combined HAPs per gallon of coating and thinning solvent, respectively, as applied (sum of all the individual HAP contents from c).
 - e. The total individual HAP emissions from all coatings and thinning solvents applied, in

Emissions Unit ID: **P001**

pounds or tons per month and pounds or tons per rolling 12-month period (the sum of b times c for each coating and thinning solvent).

- f. The total combined HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period for each HAP (the sum of b times d for each coating and thinning solvent).
3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual coatings and thinning solvents usage, in gallons.
 - b. The total OC emissions from all coatings and thinning solvents applied, in pounds or tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from coatings and thinning solvents exceeded 37.7 pounds per day, and the actual OC emissions for each such day.
 - b. All days when combined coatings and thinning solvent usage in this emissions unit exceeded 5.64 gallons per day.
 - c. All days when the OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.
 - d. All days when the individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
 - e. All exceedances of the rolling, 12-month coating and thinning solvent usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative coating and thinning solvent usage coating usage levels.
 - f. All exceedances of the rolling 12-month individual HAP limitation from emissions units P001 and P003.
 - g. All exceedances of the rolling 12-month combined HAPs limitation from emissions units P001 and P003.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:

- a. The total annual coating and thinning solvent usages, in gallons.
- b. The total OC emissions, in tons from all coatings and thinning solvents as applied.
- c. The total individual HAP emissions from all coatings and thinning solvents employed on emissions units P001 and P003.
- d. The total combined HAP emissions from all coatings and thinning solvents from emissions units P001 and P003.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 37.7 lbs/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage in gallons, of each coating and thinning solvent multiplied by its OC content, in pounds per gallon.
 - b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 6.89 TPY OC.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.
 - c. Emission Limitation -
The individual HAP emissions from emissions units P001 and P003 shall not exceed 9.9 TPY.

Applicable Compliance Method -

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Emissions Unit ID: **P001**

Compliance shall be based upon record keeping as specified in C.2 of emissions unit P001 and P003 and shall be the rolling summation of the monthly individual HAP emission rates for the previous 12 months in pounds or tons.

- d. Emission Limitation -
The combined HAP emissions from emissions units P001 and P003 shall not exceed 24.9 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in term C.2 of emissions unit P001 and P003 and shall be the rolling summation of the monthly combined HAP emission rates for the previous 12 months in pounds or tons.

F. Miscellaneous Requirements

- 1. Compliance with the HAPs emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.2, D.2, D.3, E.1.c, and E.1.d for this emissions unit are federally enforceable.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Polyurethane Foam Molding Cell No. 4 (Line No. 7)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.9 lbs/hour, 37.7 lbs/day and 6.89 tons per year (TPY).
		See A.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 TPY on a 12 month rolling basis from emissions units P001 and P003.
		The combined HAP emissions shall not exceed 24.9 tons per year (TPY) on a 12 month rolling basis from emissions units P001 and P003.
		See A.2.b.
	OAC rule 3745-21-07(G)(2)	The emissions limits established by

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Emissions Unit ID: **P003**

this rule are less stringent than the limits established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The 2.9 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The total allowable usage of HAPs as identified in section 112(b) of Title III of the Clean Air Act from emissions units P001 and P003 (the only emissions units currently emitting HAPs at the facility) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the limitation above shall be based on a rolling, 12-month summation.

B. Operational Restrictions

1. The combined use of coatings and thinning solvents in this emissions unit shall not exceed 5.64 gallons per day.
2. The OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.
3. The individual HAP content of any coatings applied in this emissions unit shall not exceed 4.26 pounds of individual HAP per gallon of coating applied.
4. The maximum coating and thinning solvent usage for this emissions unit shall not exceed 2,060 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating and thinning solvent usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating and Thinning Solvent Usage (gallons)</u>
1	171.67
1-2	343.33
2-3	515.0
3-4	686.67

Emissions Unit ID: **P003**

4-5	858.33
5-6	1,030.0
6-7	1,201.67
7-8	1,373.33
8-9	1,545.00
9-10	1,716.67
10-11	1,888.33
11-12	2,060.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating and thinning solvent usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The OC content of each coating and thinning solvent, in pounds of OC per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total OC emissions from all coatings and thinning solvents applied, in pounds per day, for this emissions unit (the sum of b times c for each coating and thinning solvent).

2. The permittee shall collect and record the following information each month for emissions units P001 and P003:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The individual HAP content for each HAP of each coating and thinning solvent in pounds of individual HAP per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total combined HAP content of each coating and thinning solvent in pounds of combined HAPs per gallon of coating and thinning solvent, respectively, as applied (sum of all the individual HAP contents from c).

- e. The total individual HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period (the sum of b times c for each coating and thinning solvent).
 - f. The total combined HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period for each HAP (the sum of b times d for each coating and thinning solvent).
3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
- a. The total annual coatings and thinning solvent usage, in gallons.
 - b. The total OC emissions from all coatings and thinning solvents applied, in pounds or tons.
 - c. The total individual HAP emissions from all coatings and thinning solvents employed on emissions units P001 and P003.
 - d. The total combined HAP emissions from all coatings and thinning solvents from emissions units P001 and P003.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
- a. Each day during which the OC emissions from coatings and thinning solvents exceeded 37.7 pounds per day, and the actual OC emissions for each such day.
 - b. All days when combined coatings and thinning solvent usage in this emissions unit exceeded 5.64 gallons per day.
 - c. All days when the OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.
 - d. All days when the individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
 - e. All exceedances of the rolling, 12-month coating and thinning solvent usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all

exceedances of the maximum allowable cumulative coating and thinning solvent usage coating usage levels.

- f. All exceedances of the rolling 12-month individual HAP limitation from emissions units P001 and P003.
- g. All exceedances of the rolling 12-month combined HAPs limitation from emissions units P001 and P003.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

- 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coatings and thinning solvent usages, in gallons.
 - b. The total OC emissions, in tons from coatings and thinning solvents as applied.
 - c. The total individual HAP emissions from all coatings and thinning solvents employed on emissions units P001 and P003.
 - d. The total combined HAP emissions from all coatings and thinning solvents employed on emissions units P001 and P003.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 37.7 lbs/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage in gallons of each coating and thinning solvent multiplied by its OC content,

in pounds per gallon.

- b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 6.89 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

- c. Emission Limitation -
The individual HAP emissions from emissions units P001 and P003 shall not exceed 9.9 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2 and shall be the rolling summation of the monthly individual HAP emission rates for the previous 12 months in pounds or tons.

- d. Emission Limitation -
The combined HAP emissions from emissions units P001 and P003 shall not exceed 24.9 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2 and shall be the rolling summation of the monthly combined HAP emission rates for the previous 12 months in pounds or tons.

F. Miscellaneous Requirements

1. Compliance with the HAPs emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.2, D.2, D.3, E.1.c, and E.1.d for this emissions unit are federally enforceable.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - EA Foam Molding Line No. 1	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 3.02 lbs/hour, 72.48 lbs/day and 13.25 tons per year (TPY).
		See A.2.a
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See B.1.
		See B.1.

2. Additional Terms and Conditions

- 2.a The 3.02 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) or HAP as identified in section 112(b) of Title III of the Clean Air Act, in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials or HAPs, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2) or Title V permitting requirements. This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each mold release solution, as applied.
 - b. The volume, in gallons, of each mold release solution applied.
 - c. The OC content of each mold release solution, in pounds of OC per gallon of mold release solution, as applied.
 - d. The total OC emissions from all mold release solutions, applied, in pounds per day, for this emissions unit (the sum of b times c for each solution).
2. The permittee shall collect and record each month for this emissions unit, any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAPs as identified in section 112(b) of Title III of the Clean Air Act, are used in this emissions unit.
3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual mold release solution usage, in gallons.
 - b. The total OC emissions from all mold release solutions applied, in pounds or tons.
4. The permit to install for this emissions unit P004 was evaluated based on the actual materials

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(mold release solution) employed, and the design parameters of the emissions units 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Hydrocarbon Naphtha

TLV(mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 3.02

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³):148

MAGLC(ug/m³): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 (typically for coatings or cleanup materials), or the use of the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. 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 its 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from mold release solutions exceeded 72.48pounds per day, and the actual OC emissions for each such day.
 - b. Any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAP as identified in section 112(b) of Title III of the Clean Air Act, were used in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit an annual report to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons, from mold release solution usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 72.48 lbs /day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage of mold release solution, in gallons, multiplied by the mold release solution

OC content, in pounds per gallon.

- b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 13.25 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

- 1. Compliance with the HAPs emission limitations in section A.1. and the monitoring, record keeping, reporting and testing requirements in sections C.2, D.2, D.3, E.1.c, and E.1.d for this emissions unit are federally enforceable.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) or HAP as identified in section 112(b) of Title III of the Clean Air Act, in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials or HAPs, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2) or Title V permitting requirements. This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each mold release solution, as applied.
 - b. The volume, in gallons, of each mold release solution applied.
 - c. The OC content of each mold release solution, in pounds of OC per gallon of mold release solution, as applied.
 - d. The total OC emissions from all mold release solutions, applied, in pounds per day, for this emissions unit (the sum of b times c for each solution).
2. The permittee shall collect and record each month for this emissions unit, any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAP as identified in section 112(b) of Title III of the Clean Air Act, are used in this emissions unit.
3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual mold release solution usage, in gallons.
 - b. The total OC emissions from all mold release solutions applied, in pounds or tons.
4. The permit to install for this emissions unit P004 was evaluated based on the actual materials (mold release solution) employed, and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review

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of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Hydrocarbon Naphtha

TLV(mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 3.02

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³):148

MAGLC(ug/m³): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 (typically for coatings or cleanup materials), or the use of the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- 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.).

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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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. 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 its 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from mold release solution exceeded 72.48 pounds per day, and the actual OC emissions for each such day.
 - b. Any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAP as identified in section 112(b) of Title III of the Clean Air Act, were used in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons from mold release solution usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 72.48 lbs/day.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage of mold release solution multiplied by the mold release solution OC content, in pounds per gallon.
 - b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 13.25 TPY.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the rolling summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. Compliance with the HAPs emission limitations in section A.1. and the monitoring, record keeping, reporting and testing requirements in sections C.2, D.2, D.3, E.1.c, and E.1.d for this emissions unit are federally enforceable.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - EA Foam Molding Line No. 8	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 3.02 lbs/hour, 72.48 lbs/day and 13.25 tons per year (TPY).
		See A.2.a
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See B.1.
		See B.1.

2. Additional Terms and Conditions

- 2.a The 3.02 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) or HAP as identified in section 112(b) of Title III of the Clean Air Act, in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials or HAPs, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2) or Title V permitting requirements. This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each mold release solution, as applied.
 - b. The volume, in gallons, of each mold release solution applied.
 - c. The OC content of each mold release solution, in pounds of OC per gallon of mold release solution, as applied.
 - d. The total OC emissions from all mold release solutions, applied, in pounds per day, for this emissions unit (the sum of b times c for each solution).
2. The permittee shall collect and record each month for this emissions unit, any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAPs as identified in section 112(b) of Title III of the Clean Air Act, are used in this emissions unit.
3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual mold release solution usages, in gallons.
 - b. The total OC emissions from all mold release solutions applied, in pounds or tons.
4. The permit to install for this emissions unit P004 was evaluated based on the actual materials (mold release solution) employed, and the design parameters of the emissions units 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Hydrocarbon Naphtha

TLV(mg/m³): 572,597

Maximum Hourly Emission Rate (lbs/hr): 3.02

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³):148

MAGLC(ug/m³): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 (typically for coatings or cleanup materials), or the use of the new materials, that would result in the emission of a compound with a lower Threshold Limit Value(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- 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

Emissions Unit ID: **P006**

Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

5. 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 its 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from mold release solution exceeded 72.48 pounds per day, and the actual OC emissions for each such day.
 - b. Any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAPs as identified in section 112(b) of Title III of the Clean Air Act, were used in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons, from mold release solution usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be

determined in accordance with the following methods:

a. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 72.48 lbs/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage of mold release solution multiplied by the mold release solution OC content, in pounds per gallon.

b. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 13.25 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. Compliance with the HAPs emission limitations in section A.1. and the monitoring, record keeping, reporting and testing requirements in sections C.2, D.2, D.3, E.1.c, and E.1.d for this emissions unit are federally enforceable.