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

1/7/2014

Certified Mail

Beth Pristas
Johnson Controls Inc.
1147 North Washington St.
Greenfield, OH 45123

Facility ID: 0536010034
Permit Number: P0115586
County: Highland

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Times Gazette. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-SWDO; Indiana; Kentucky

PUBLIC NOTICE
1/7/2014 Issuance of Draft Air Pollution Title V Permit

Johnson Controls Inc.
1147 North Washington St.,
Greenfield, OH 45123
Highland County
FACILITY DESC.: Motor Vehicle Seating and Interior Trim Manufacturing
PERMIT #: P0115586
PERMIT TYPE: Renewal
PERMIT DESC: Automobile seating and foam manufacturer

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0536010034
Facility Name:	Johnson Controls Inc.
Facility Description:	Automobile seating and foam manufacturer
Facility Address:	1147 North Washington St., Greenfield, OH 45123
Permit #:	P0115586, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide **X** Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	PTI P0107662, Administrative Modification, has the following changes: The air flow rate at the inlet to the thermal incinerator shall be no less than the following: 20,560 standard cubic feet per minute (scfm), when multiple polyurethane foam molding lines, which have control requirements, are operating; and 10,300 scfm, when an individual polyurethane foam molding line, which has control requirements, is operating. The recordkeeping will stay the same and the reporting requirements will add the 10,300 scfm limit for single line use.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	P005, P007, VOC; The CAM performance indicators for VOC emissions include combustion temperature for destruction and air flow rate at the thermal incinerator inlet for capture.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

C. Emissions Unit Terms and Conditions

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

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P005	13.0 lbs of VOC/hr	31-05(A)(3)								Y			
	0.5 lbs of PE/hr									Y			
	10% opacity									Y			
	Use of thermal incinerator					Y		Y	Y	Y			Based on allowable temperature range and monitoring
	41.5 tons/rolling 365 day summation	31-05(D)				Y		Y	Y	Y			
	Use of a panel filter system	17-11(C)				Y		Y	Y	Y			
	CAM Plan		40 CFR Part 64		Y	Y		Y	Y	Y			The air flow rate at the inlet to the thermal incinerator shall be no less than the following: 20,560 standard cubic feet per minute (scfm), when multiple polyurethane foam molding lines, which have control requirements, are operating; and 10,300 scfm, when an individual polyurethane foam molding line, which has control requirements, is operating.

													The incinerator temperature monitoring will assure the control is maintained within the range of the previous compliance test.
P007	17.0 lbs of VOC/hr	31-05(A)(3)								Y			
	0.5 lbs of PE/hr									Y			
	10% opacity									Y			
	Use of a thermal incinerator					Y		Y	Y	Y			Based on allowable temperature range and monitoring
	52.88 tons/rolling 365 day summation	31-05(D)				Y		Y	Y	Y			
	Use of a panel filter system	17-11(C)				Y		Y	Y	Y			
	CAM Plan	40 CFR Part 64			Y	Y		Y	Y	Y			The air flow rate at the inlet to the thermal incinerator shall be no less than the following: 20,560 standard cubic feet per minute (scfm), when multiple polyurethane foam molding lines, which have control requirements, are operating; and 10,300 scfm, when an individual polyurethane foam molding line, which has control requirements, is operating. The incinerator temperature monitoring will assure the control is maintained within the range of the previous compliance test.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Johnson Controls Inc.

Facility ID:	0536010034
Permit Number:	P0115586
Permit Type:	Renewal
Issued:	1/7/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Johnson Controls Inc.

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Authorization

Facility ID:	0536010034
Facility Description:	Automobile seating and foam manufacturer
Application Number(s):	A0048586
Permit Number:	P0115586
Permit Description:	Automobile seating and foam manufacturer
Permit Type:	Renewal
Issue Date:	1/7/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0107661

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Johnson Controls Inc.
1147 North Washington St.
Greenfield, OH 45123

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) 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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Southwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. 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 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.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Ohio EPA DAPC, Southwest District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Southwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) B)2.c)

2. The following are facility-wide terms and conditions:

   a) The Ohio EPA has approved the compliance assurance monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units P005 and P007. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

      (Authority for term: 40 CFR Part 64).

   b) Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21. The following emissions units are defined as insignificant emission units at this facility and meet the requirements of either an exemption under OAC rule 3745-31-03 or have a uncontrolled potential of less than 5 tons per year as defined under OAC rule 3745-77-01(U):

      (1) P011- Emergency Fire Pump generator;

      (2) P014 – Ink Application Area; and

      (3) T001 to T017 – Organic storage tanks < 5000 gallon capacity, each.

C. Emissions Unit Terms and Conditions

1. P005, Foam Line 2

Operations, Property and/or Equipment Description:

Polyurethane foam molding line 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e., d)(7), (8), and (9), below.

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)	Volatile organic compound (VOC) emissions shall not exceed 13.0 pounds per hour Particulate emissions (PE) shall not exceed 0.5 pounds per hour or 1.3 tons per year. Visible PE from the stack shall not exceed 10% opacity, except during clean out During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity.
b.	OAC rules 3745-17-07(A) and 3745-17-11(B)	b)(2)b, below.
c.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 41.5 tons as a rolling, 365-day summation.
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	c)(2), c)(5), d)(1), d)(5), and d)(6), below.
e.	OAC rule 3745-114-01	Ohio Toxic Rule.

(2) Additional Terms and Conditions

a. The 13.0 lbs VOC per hour and the 0.5 lbs PE per hour limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.

b. The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Highland County.

This emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(3) The maximum annual spray mold release agent usage for this emissions unit shall not exceed 118.6 tons, based upon a rolling, 365-day summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(4) The maximum annual paste mold release agent usage for this emissions unit shall not exceed 19.5 tons, based upon a rolling, 365-day summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(5) The air flow rate at the inlet to the thermal incinerator shall be no less than the following:

a. 20,560 standard cubic feet per minute (scfm), when multiple polyurethane foam molding lines, which have control requirements, are operating; and

b. 10,300 scfm, when an individual polyurethane foam molding line, which has control requirements, is operating.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(6) The permittee shall operate a metal mesh filter system to control PE whenever this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain daily records of the following information for this emissions unit:

a. the company name and identification for the spray mold release agent employed;

b. the VOC content of the spray mold release agent employed, in % by weight;

c. the spray mold release agent usage for each day, in pounds;

d. the rolling, 365-day summation of spray mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);

e. the company name and identification for the paste mold release agent employed;

f. the VOC content of the paste mold release agent employed, in % by weight;

g. the paste mold release agent usage for each day, in pounds; and

h. the rolling, 365-day summation of paste mold release agent usage, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall calculate and maintain daily records of the following for this emissions unit:

a. the VOC emissions, in pounds, for the spray mold release agent, calculated as follows:

Es = (Us) x (VOCs) x [1 - (CE x DE)]

Where:

Es = the daily VOC emission rate for the spray mold release agent, in pounds;

Us = the daily spray mold release agent usage, in pounds (from d)(2)c. above);

VOCs = the VOC content of the spray mold release agent, in %, by weight (from d)(3)b. above);

CE = the capture efficiency, as determined during the most recent compliance demonstration; and

DE = the destruction efficiency, as determined during the most recent compliance demonstration.

b. the VOC emissions, in pounds, for the paste mold release agent, calculated as follows:

Ep = (Up) x (VOCp)

Where:

Ep = the daily VOC emission rate for the paste mold release agent, in pounds;

Up = the daily paste mold release agent usage, in pounds (from d)(2)g. above); and

VOCp = the VOC content of the paste mold release agent, in %, by weight (from d)(2)f, above).

c. the total VOC emission rate, in pounds, i.e., Es + Ep; and

d. the rolling, 365-day VOC emission rate, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall maintain records that document any time periods when the panel metal mesh filter system serving as PE control for this emissions unit was not in service while this emissions unit was operating.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air flow rate at the thermal incinerator inlet for capture. The combustion temperature indicator range for the thermal incinerator shall be any combustion temperature more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance. The air flow rate at the inlet of the thermal incinerator indicator is identified in section A.II.5 for this emissions unit. The most recent compliance demonstration was used as the basis for developing the combustion temperature and air flow rate indicators. If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64]

(6) The permittee shall measure the air flow velocity at the inlet to the thermal incinerator with a minimum frequency of once per day while this emissions unit is in operation. The velocity measurement shall be performed in accordance with the procedures outlined in the CAM plan with any changes approved by Ohio EPA, Southwest District Office. Based upon the daily measured velocity, the permittee shall calculate the air flow rate. Units shall be in standard cubic feet per minute. The velocity measuring device shall be capable of accurately measuring the desired parameter. The measuring device shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64]

(7) The permit to install for emissions units P005 and P007 was evaluated based on the actual materials 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 these emissions units 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 summarizes the results of the modeling for the "worst case" pollutant(s):

a. Pollutant: Naptha (64742-47-8)

TLV (ug/m3): 200,000

Maximum hourly emission rate (lbs/hr): 12.1

Predicted 1-hour maximum ground level concentration (ug/m3): 2,056

Maximum acceptable ground level concentration (ug/m3): 4,761

b. *Pollutant: 2,4 TDI (584-84-9)

TLV (ug/m3): 35.6

Maximum hourly emission rate (lbs/hr): 0.0065**

Predicted 1-hour maximum ground level concentration (ug/m3): 0.761**

Maximum acceptable ground level concentration (ug/m3): 0.848

c. *Pollutant: Diethanol-amine (111-42-2)

TLV (ug/m3): 2,000

Maximum hourly emission rate (lbs/hr): 0.00032 lbs/hr

Predicted 1-hour maximum ground level concentration (ug/m3): 0.025

Maximum acceptable ground level concentration (ug/m3): 47.6

* Please note that the worst case annual emissions of TDI and Diethanol-amine are 0.1 tons and 0.0014 tons, respectively. Since the annual emissions are below 1 ton the emissions do not have to comply with the MAGLC.

** TDI emission rate and Predicted 1-hour maximum ground level concentration is from JCI's Sept. 2, 2011, review and study.

(8) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(9) 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. a 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(2), above;

b. any exceedances of the rolling, 365-day spray mold release agent usage rate of 118.6 tons;

c. any exceedances of the rolling, 365-day paste mold release agent usage rate of 19.5 tons;

d. any exceedances of the rolling, 365-day VOC emission limitation of 41.50 tons;

e. all days when the calculated air flow rate at the inlet to the thermal incinerator did not comply with air flow rate limitation of 25,200 scfm and when multiple polyurethane foam molding lines, which have control requirements, are operating; and

f. all days when the calculated air flow rate at the inlet to the thermal incinerator did not comply with air flow rate limitation of 10,300 scfm, and when an individual polyurethane foam molding line, which has control requirements, is operating.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the panel metal mesh filter system serving as PE control for this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:13.0 pounds VOC per hour

The hourly allowable VOC emission limitation was determined based on the following equation:

Evoc = (Uspray) x (VOCs) x [1 - (CE x DE)] + (Upaste) x (VOCp)

Where:

Evoc = the maximum hourly VOC emission rate (lbs/hr);

Uspray = the maximum hourly spray release agent usage rate (41.7 lbs);

VOCs = the VOC content of the spray mold release agent (maximum of 96% or 0.96);

(CE x DE)= the capture efficiency multiplied by the destruction efficiency (Stack test from January 17 and 18, 2007, capture efficiency was determined to be 61.14% and destruction efficiency was determined to be 96.87%);

Upaste = the maximum hourly paste release agent usage rate (5.2 lbs); and

VOCp = the VOC content of paste mold release agent (maximum of 96% or 0.96)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission tests conducted in accordance with the procedures outlined in f)(2) of this permit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

b. Emission Limitation:

41.50 tons VOC per rolling, 365-day summation

Applicable Compliance Method:

Compliance with the rolling, 365-day VOC emission limitation shall be determined through the record keeping requirements established in section d), of this permit.

c. Emission Limitations:

0.5 pound PE per hour

1.3 tons PE per year

The hourly PE limitation was established as follows:

Epe = (Uspray) x (S) x [1 - (CE x RE)]

Where:

Epe = the maximum hourly PE rate (lbs/hr);

Uspray = the maximum hourly spray release agent usage rate (41.7 lbs/hr);

S = the solids content of the spray mold release agent (maximum of 5% or 0.05);

CE = the capture efficiency (assumed to be 100% for solids); and

RE = the removal efficiency (assumed to be 78% for metal mesh panel filters)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with hourly PE limitation above through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

The annual PE limitation was established as follows:

Ape = (Aspray) x (S) x [1 - (CE x RE)]

Where:

Ape = the maximum annual PE rate (tons/yr);

Aspray = the maximum annual spray release agent usage rate (118.6 tons/year);

S = the solids content of the spray mold release agent (maximum of 5% or 0.05);

CE = the capture efficiency (assumed to be 100% for solids); and

RE = the removal efficiency (assumed to be 78% for panel filters)

d. Visible Emission Limitation:

10% opacity from the stack

During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control efficiency requirement above shall be demonstrated based on the results of emission tests conducted in accordance with the procedures as outlined in f)(2), of this permit.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within 12 months prior to the expiration of the Title V covering this facility.

b. The emission testing shall be conducted to demonstrate compliance with the following: the hourly VOC emission limitation and overall control efficiency requirements (both capture and control) for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

(3) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office. to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

g) Miscellaneous Requirements

(1) None.

2. P007, Foam Line 1

Operations, Property and/or Equipment Description:

Polyurethane foam molding line 1

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e., d)(7), (8), and (9), below.

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)	Volatile organic compound (VOC) emissions shall not exceed 16.1 pounds per hour Particulate emissions (PE) shall not exceed 0.5 pound per hour and 1.3 tons per year. Visible PE from the stack shall not exceed 10% opacity, as a six-minute average, except during wax clean-out. During wax clean-out, the visible PE shall not exceed 20% opacity, as a six-minute average, except for one six-minute period in any one hour where the visible PE may not exceed 60% opacity.
b.	OAC rules 3745-17-07(A) and 3745-17-11(B)	b)(2)b, below.
c.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 43.97 tons per rolling, 365-day period.
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	c)(2), c)(5), d)(2), d)(6), and d)(7), below.
e.	OAC rule 3745-114-01	Ohio Toxic Rule.

(2) Additional Terms and Conditions

a. The 16.1 lbs VOC per hour, 0.5 lb PE per hour and 1.3 tons PE/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

[Authority for Term: OAC rule 3745-31-05(A)(3)]

b. The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Highland County

This emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(2) The maximum annual spray mold release agent usage for this emissions unit shall not exceed 118.6 tons per rolling 365-day period, based upon a summation of the daily spray mold release agent usage rates.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(3) The maximum annual paste mold release agent usage for this emissions unit shall not exceed 10.7 tons per rolling, 365-day period, based upon a summation of the daily paste mold release agent usage rates.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(4) The air flow rate at the inlet to the thermal incinerator shall be no less than the following:

a. 20,560 standard cubic feet per minute (scfm), when multiple polyurethane foam molding lines, which have control requirements, are operating; and

b. 10,300 scfm, when an individual polyurethane foam molding line, which has control requirements, is operating.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(5) The permittee shall operate a panel metal mesh filter system to control PE whenever this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(6) The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain daily records of the following information for this emissions unit:

a. the company name and identification for the spray mold release agent employed;

b. the VOC content of the spray mold release agent employed, in % by weight;

c. the spray mold release agent usage for each day, in pounds;

d. the rolling, 365-day summation of spray mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);

e. the company name and identification for the paste mold release agent employed;

f. the VOC content of the paste mold release agent employed, in % by weight;

g. the paste mold release agent usage for each day, in pounds; and

h. the rolling, 365-day summation of paste mold release agent usage, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall calculate and maintain daily records of the following for this emissions unit:

a. the VOC emissions, in pounds, for the spray mold release agent, calculated as follows:

Es = (Us) x (VOCs) x [1 - (CE x DE)]

Where:

Es = the daily VOC emission rate for the spray mold release agent, in pounds;

Us = the daily spray mold release agent usage, in pounds (from d)(2)c. above);

VOCs = the VOC content of the spray mold release agent, in %, by weight (from d)(3)b. above);

CE = the capture efficiency, as determined during the most recent compliance demonstration; and

DE = the destruction efficiency, as determined during the most recent compliance demonstration.

b. the VOC emissions, in pounds, for the paste mold release agent, calculated as follows:

Ep = (Up) x (VOCp)

Where:

Ep = the daily VOC emission rate for the paste mold release agent, in pounds;

Up = the daily paste mold release agent usage, in pounds (from d)(2)g. above); and

VOCp = the VOC content of the paste mold release agent, in %, by weight (from d)(3)f, above).

c. the total VOC emission rate, in pounds, i.e., Es + Ep; and

d. the rolling, 365-day VOC emission rate, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall maintain records that document any time periods when the panel metal mesh filter system serving as PE control for this emissions unit was not in service while this emissions unit was operating.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain records that document any time periods when the panel metal mesh filter system serving as PE control for this emissions unit was not in service while this emissions unit was operating.

The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air flow rate at the thermal incinerator inlet for capture. The combustion temperature indicator range for the thermal incinerator shall be any combustion temperature more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance. The air flow rate at the inlet of the thermal incinerator indicator is identified in section A.II.5 for this emissions unit. The most recent compliance demonstration was used as the basis for developing the combustion temperature and air flow rate indicators. If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64]

(6) The permittee shall measure the air flow velocity at the inlet to the thermal incinerator with a minimum frequency of once per day while this emissions unit is in operation. The velocity measurement shall be performed in accordance with the procedures outlined in the CAM plan with any changes approved by Ohio EPA, Southwest District Office. Based upon the daily measured velocity, the permittee shall calculate the air flow rate. Units shall be in standard cubic feet per minute. The velocity measuring device shall be capable of accurately measuring the desired parameter. The measuring device shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Parts 64]

(7) The permit to install for emissions units P005 and P007 was evaluated based on the actual materials 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 these emissions units 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 summarizes the results of the modeling for the "worst case" pollutant(s):

a. Pollutant: Naptha (64742-47-8)

TLV (ug/m3): 200,000

Maximum hourly emission rate (lbs/hr): 12.1

Predicted 1-hour maximum ground level concentration (ug/m3): 2,056

Maximum acceptable ground level concentration (ug/m3): 4,761

b. *Pollutant: 2,4 TDI (584-84-9)

TLV (ug/m3): 35.6

Maximum hourly emission rate (lbs/hr): 0.0065**

Predicted 1-hour maximum ground level concentration (ug/m3): 0.761**

c. *Pollutant: Diethanol-amine (111-42-2)

TLV (ug/m3): 2,000

Maximum hourly emission rate (lbs/hr): 0.00032 lbs/hr

Predicted 1-hour maximum ground level concentration (ug/m3): 0.025

Maximum acceptable ground level concentration (ug/m3): 47.6

* Please note that the worst case annual emissions of TDI and Diethanol-amine are 0.1 tons and 0.0014 tons, respectively. Since the annual emissions are below 1 ton the emissions do not have to comply with the MAGLC.

** TDI emission rate and Predicted 1-hour maximum ground level concentration is from JCI's Sept. 2, 2011, review and study.

(8) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(9) 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. a 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(2), above;

b. any exceedances of the rolling, 365-day spray mold release agent usage rate of 118.6 tons;

c. any exceedances of the rolling, 365-day paste mold release agent usage rate of 10.7 tons;

d. any exceedances of the rolling, 365-day VOC emission limitation of 41.50 tons;

e. all days when the calculated air flow rate at the inlet to the thermal incinerator did not comply with air flow rate limitation of 25,200 scfm and when multiple polyurethane foam molding lines, which have control requirements, are operating; and

f. all days when the calculated air flow rate at the inlet to the thermal incinerator did not comply with air flow rate limitation of 10,300 scfm, and when an individual polyurethane foam molding line, which has control requirements, is operating.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the panel metal mesh filter system serving as PE control for this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:16.1 pounds VOC per hour

The hourly allowable VOC emission limitation was determined based on the following equation:

Evoc = (Uspray) x (VOCs) x [1 - (CE x DE)] + (Upaste) x (VOCp)

Where:

Evoc = the maximum hourly VOC emission rate (lbs/hr)

Uspray = the maximum hourly spray release agent usage rate (41.7 lbs)

VOCs = the VOC content of the spray mold release agent (maximum of 95% or 0.95)

CE = the VOC capture efficiency from the spray mold release agents, as determined during the most recent compliance test

DE = the VOC destruction efficiency, as determined during the most recent compliance test

Upaste = the maximum hourly paste release agent usage rate (4.4 lbs)

VOCp = the VOC content of paste mold release agent (maximum of 95% or 0.95)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission tests conducted in accordance with the procedures outlined in f)(2) of this permit.

b. Emission Limitation:

43.97 tons VOC per rolling, 365-day summation

Applicable Compliance Method:

Compliance with the rolling, 365-day VOC emission limitation shall be determined through the record keeping requirements established in section d), of this permit.

c. Emission Limitations:

0.5 pound PE per hour

1.3 tons PE per year

The hourly PE limitation was established as follows:

Epe = (Uspray) x (S) x [1 - (CE x RE)]

Where:

Epe = the maximum hourly PE rate (lbs/hr);

Uspray = the maximum hourly spray release agent usage rate (41.7 lbs/hr);

S = the solids content of the spray mold release agent (maximum of 5% or 0.05);

CE = the capture efficiency (assumed to be 100% for solids); and

RE = the removal efficiency (assumed to be 78% for panel metal mesh filters).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with hourly PE limitation above through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

The annual PE limitation was established as follows:

Ape = (Aspray) x (S) x [1 - (CE x RE)]

Where:

Ape = the maximum annual PE rate (tons/yr);

Aspray = the maximum annual spray release agent usage rate (118.6 tons/year);

S = the solids content of the spray mold release agent (maximum of 5% or 0.05);

CE = the capture efficiency (assumed to be 100% for solids); and

RE = the removal efficiency (assumed to be 78% for panel filters)

d. Visible Emission Limitation:

Visible PE from the stack shall not exceed 10% opacity, as a six-minute average, except during wax clean-out.

During wax clean-out, the visible PE shall not exceed 20% opacity, as a six-minute average, except for one six-minute period in any one hour where the visible PE may not exceed 60% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

e. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the materials employed in this emissions unit.

f. Emission Limitation:

The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control efficiency requirement above shall be demonstrated based on the results of emission tests conducted in accordance with the procedures as outlined in f)(2), of this permit.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within 12 months prior to the expiration of the Title V covering this facility.

b. The emission testing shall be conducted to demonstrate compliance with the following: the hourly VOC emission limitation and overall control efficiency requirements (both capture and control) for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. Method 1 of 40 CFR Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR Part 60, Appendix A (for moisture content of gas stream); and

v. Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The destruction control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA, Southwest District Office.

(3) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office

g) Miscellaneous Requirements

(1) None.