

Facility ID: 0857043129 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P003](#)
- [Go to Part II for Emissions Unit P004](#)
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Facility ID: 0857043129 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Polyurethane Foam Molding Cell No. 2 (Line No. 6)	OAC rule 3745-31-05(A)(3) PTI 08-04566	The organic compound (OC) emissions from this emissions unit shall not exceed 2.9 lbs/hour, 37.7 lbs/day and 6.89 tons per year (TPY). See A.2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B). The individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 TPY on a 12 month rolling basis from emissions units P001 and P003.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The combined HAP emissions shall not exceed 24.9 tons per year (TPY) on a 12 month rolling basis from emissions units P001 and P003. See A.2.b. The emissions limits established by this rule are less stringent than the limits established by OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

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

B. Operational Restrictions

1. The combined use of coatings and thinning solvents in this emissions unit shall not exceed 5.64 gallons per day.
2. The OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.

3. The individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
 4. The maximum coating and thinning solvent usage for this emissions unit shall not exceed 2,060 gallons based upon a rolling 12-month summation.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day for emission unit P001:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The OC content of each coating and thinning solvent, in pounds of OC per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total OC emissions from all coatings and thinning solvents applied, in pounds per day, for this emission unit (the sum of b times c for each coating and thinning solvent).
 2. The permittee shall collect and record the following information each month for emissions units P001 and P003:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The individual HAP content for each HAP of each coating and thinning solvent in pounds of individual HAP per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total combined HAP content of each coating and thinning solvent in pounds of combined HAPs per gallon of coating and thinning solvent, respectively, as applied (sum of all the individual HAP contents from c).
 - e. The total individual HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period (the sum of b times c for each coating and thinning solvent).
 - f. The total combined HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period for each HAP (the sum of b times d for each coating and thinning solvent).
 3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual coatings and thinning solvents usage, in gallons.
 - b. The total OC emissions from all coatings and thinning solvents applied, in pounds or tons.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from coatings and thinning solvents exceeded 37.7 pounds per day, and the actual OC emissions for each such day.
 - b. All days when combined coatings and thinning solvent usage in this emissions unit exceeded 5.64 gallons per day.
 - c. All days when the OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.
 - d. All days when the individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
 - e. All exceedances of the rolling, 12-month coating and thinning solvent usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative coating and thinning solvent usage coating usage levels.
 - f. All exceedances of the rolling 12-month individual HAP limitation from emissions units P001 and P003.
 - g. All exceedances of the rolling 12-month combined HAPs limitation from emissions units P001 and P003.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
 2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The total annual coating and thinning solvent usages, in gallons.
 - b. The total OC emissions, in tons from all coatings and thinning solvents as applied.
 - c. The total individual HAP emissions from all coatings and thinning solvents employed on emissions units P001 and P003.
 - d. The total combined HAP emissions from all coatings and thinning solvents from emissions units P001 and P003.

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

E. Testing Requirements

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

 Applicable Compliance Method -

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

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

 Applicable Compliance Method -
 Compliance shall be based upon record keeping as specified in C.2 of emissions unit P001 and P003 and shall be the rolling summation of the monthly individual HAP emission rates for the previous 12 months in pounds or tons.
 Emission Limitation -
 The combined HAP emissions from emissions units P001 and P003 shall not exceed 24.9 TPY.

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

F. Miscellaneous Requirements

1. None

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Facility ID: 0857043129 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Polyurethane Foam Molding Cell No. 4 (Line No. 7)	OAC rule 3745-31-05(A)(3) PTI 08-04566	The organic compound (OC) emissions from this emissions unit shall not exceed 2.9 lbs/hour, 37.7 lbs/day and 6.89 tons per year (TPY). See A.2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B). The individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 TPY on a 12 month rolling basis from emissions units P001 and P003.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	The combined HAP emissions shall not exceed 24.9

tons per year (TPY) on a 12 month rolling basis from emissions units P001 and P003.

See A.2.b.

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

OAC rule 3745-21-07(G)(2)

2. Additional Terms and Conditions

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

B. Operational Restrictions

1. The combined use of coatings and thinning solvents in this emissions unit shall not exceed 5.64 gallons per day.
2. The OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.
3. The individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
4. The maximum coating and thinning solvent usage for this emissions unit shall not exceed 2,060 gallons based upon a rolling 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emission unit P001:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The OC content of each coating and thinning solvent, in pounds of OC per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total OC emissions from all coatings and thinning solvents applied, in pounds per day, for this emission unit (the sum of b times c for each coating and thinning solvent).
2. The permittee shall collect and record the following information each month for emissions units P001 and P003:
 - a. The name and identification number of each coating and thinning solvent, as applied.
 - b. The volume, in gallons, of each coating and thinning solvent applied.
 - c. The individual HAP content for each HAP of each coating and thinning solvent in pounds of individual HAP per gallon of coating and thinning solvent, respectively, as applied.
 - d. The total combined HAP content of each coating and thinning solvent in pounds of combined HAPs per gallon of coating and thinning solvent, respectively, as applied (sum of all the individual HAP contents from c).
 - e. The total individual HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period (the sum of b times c for each coating and thinning solvent).
 - f. The total combined HAP emissions from all coatings and thinning solvents applied, in pounds or tons per month and pounds or tons per rolling 12-month period for each HAP (the sum of b times d for each coating and thinning solvent).
3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual coatings and thinning solvents usage, in gallons.
 - b. The total OC emissions from all coatings and thinning solvents applied, in pounds or tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from coatings and thinning solvents exceeded 37.7 pounds per day, and the actual OC emissions for each such day.
 - b. All days when combined coatings and thinning solvent usage in this emissions unit exceeded 5.64 gallons per day.
 - c. All days when the OC content of the coatings used in this emissions unit shall not exceed 6.69 pounds of OC per gallon of coating applied.

- d. All days when the individual HAP content of any coating applied in this emissions unit shall not exceed 4.26 pounds of HAP per gallon of coating applied.
- e. All exceedances of the rolling, 12-month coating and thinning solvent usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative coating and thinning solvent usage coating usage levels.
- f. All exceedances of the rolling 12-month individual HAP limitation from emissions units P001 and P003.
- g. All exceedances of the rolling 12-month combined HAPs limitation from emissions units P001 and P003.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

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

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - Emission Limitation -
The OC emissions from this emissions unit shall not exceed 37.7 lbs/day.
 - Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage in gallons, of each coating and thinning solvent multiplied by its OC content, in pounds per gallon.
 - Emission Limitation -
The OC emissions from this emissions unit shall not exceed 6.89 TPY OC.
 - Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.
 - Emission Limitation -
The individual HAP emissions from emissions units P001 and P003 shall not exceed 9.9 TPY.
 - Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2 of emissions unit P001 and P003 and shall be the rolling summation of the monthly individual HAP emission rates for the previous 12 months in pounds or tons.
 - Emission Limitation -
The combined HAP emissions from emissions units P001 and P003 shall not exceed 24.9 TPY.
 - Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in term C.2 of emissions unit P001 and P003 and shall be the rolling summation of the monthly combined HAP emission rates for the previous 12 months in pounds or tons.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0857043129 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law

only with the exception of those listed below which are federally enforceable.

- (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - EA Foam Molding Line No. 1	OAC rule 3745-31-05(A)(3) PTI 08-04566	The organic compound (OC) emissions from this emissions unit shall not exceed 3.02 lbs/hour, 72.48 lbs/day and 13.25 tons per year (TPY). See A.2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07(G)(2). See B.1. See B.1.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V) OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

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

B. Operational Restrictions

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

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

C. Monitoring and/or Record Keeping Requirements

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

Pollutant: Hydrocarbon Naphtha

TLV(mg/m3): 572,597

Maximum Hourly Emission Rate (lbs/hr): 3.02

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

MAGLC(ug/m3): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the Permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

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

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation -
The OC emissions from this emissions unit shall not exceed 72.48 lbs /day.
- Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage of mold release solution, in gallons, multiplied by the mold release solution OC content, in pounds per gallon.
- Emission Limitation -
The OC emissions from this emissions unit shall not exceed 13.25 TPY.
- Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. None

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Facility ID: 0857043129 Emissions Unit ID: P005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - EA Foam Molding Line No. 2	OAC rule 3745-31-05(A)(3) PTI 08-04566	The organic compound (OC) emissions from this emissions unit shall not exceed 3.02 lbs/hour, 72.48 lbs/day and 13.25 tons per year (TPY). See A.2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07(G)(2). See B.1.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	See B.1.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

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

B. Operational Restrictions

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

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

C. Monitoring and/or Record Keeping Requirements

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

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

Pollutant: Hydrocarbon Naphtha

TLV(mg/m3): 572,597

Maximum Hourly Emission Rate (lbs/hr): 3.02

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

MAGLC(ug/m3): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the Permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

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

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

E. Testing Requirements

- Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - Emission Limitation -
The OC emissions from this emissions unit shall not exceed 72.48 lbs /day.
 - Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be determined by the usage of mold release solution, in gallons, multiplied by the mold release solution OC content, in pounds per gallon.
 - Emission Limitation -
The OC emissions from this emissions unit shall not exceed 13.25 TPY.
 - Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the summation of the daily OC emission rates, in pounds, for the calendar year and divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

- None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857043129 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - EA Foam Molding Line No. 8	OAC rule 3745-31-05(A)(3) PTI 08-04566	The organic compound (OC) emissions from this emissions unit shall not exceed 3.02 lbs/hour, 72.48 lbs/day and 13.25 tons per year (TPY). See A.2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07(G)(2). See B.1. See B.1.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

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

B. Operational Restrictions

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

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

C. Monitoring and/or Record Keeping Requirements

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

3. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
 - a. The total annual mold release solution usage, in gallons.
 - b. The total OC emissions from all mold release solutions applied, in pounds or tons.
4. The permit to install for this emissions unit P004 was evaluated based on the actual materials (mold release solution) employed, and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Hydrocarbon Naphtha

TLV(mg/m3): 572,597

Maximum Hourly Emission Rate (lbs/hr): 3.02

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

MAGLC(ug/m3): 5,726

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the Permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. **Reporting Requirements**
 1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each day during which the OC emissions from mold release solutions exceeded 72.48pounds per day, and the actual OC emissions for each such day.
 - b. Any day when photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or HAP as identified in section 112(b) of Title III of the Clean Air Act, were used in this emissions unit.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
 2. The permittee shall submit an annual report to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specifies the total OC emissions, in tons, from mold release solution usage. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. **Testing Requirements**
 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

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

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

Emission Limitation -

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

Applicable Compliance Method -

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

F. **Miscellaneous Requirements**

1. None