

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 P004](#)
- [Go to Part II for Emissions Unit P005](#)
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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 - Energy Absorbing Foam Molding Line No. 6	OAC rule 3745-31-05(A)(3) PTI 08-04706	The organic compound (OC) emissions from this emissions unit shall not exceed 1.31 lbs/hour, 31.5 lbs/day and 4.18 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 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) The 1.31 pounds of OC per hour and 31.5 lbs OC per day limitations were 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 OC content of the coatings and thinning solvents used in this emissions unit shall not exceed 6.58 pounds of OC per gallon of coating and thinning solvent applied.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum coating and thinning solvent combined usage for this emissions unit shall not exceed 360 gallons based upon a rolling 12-month summation.
4. The maximum mold release usage for this emissions unit shall not exceed 960 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 month for emissions units P001, P004, P005, P006, P007 and P008:

- a. The name and identification number of each mold release, coating, and thinning solvent, as applied in each emissions unit.
  - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
  - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
  - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating, and thinning solvent divided by 2,000 lbs/ton).
  - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
- a. The total annual coating and thinning solvent use and mold release use, in gallons.
  - b. The total annual OC emissions from all coating and thinning solvent use and mold release use, in tons.
3. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's 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 summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: toluene
- TLV (mg/m3): 188.4 mg/m3
- Maximum Hourly Emission Rate (lbs/hr): 0.33 lbs/hr
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49.2 ug/m3
- MAGLC (ug/m3): 4486 ug/m3
- 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.).
4. 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.
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. All days when the OC content of the coatings and thinning solvents used in this emissions unit shall not exceed 6.58 pounds of OC per gallon of coating and thinning solvent applied.
    - b. All days when the OC content of the mold release used in this emissions unit exceeded 6.24 pounds of OC per gallon of mold release applied.
    - c. 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 levels.

- d. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
- e. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted to the Ohio EPA 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 rolling 12 month annual coating and thinning solvent and mold release usages, in gallons.
  - b. The total OC emissions, in tons, from all coatings and thinning solvents and mold release as applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emissions limitations in section A.I.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 1.31 lbs/hour.

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined as follows:

i. Multiply the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coatings usage rate (gallons/hr);

ii. Multiply the maximum OC content of all thinning materials (lbs OC/gallon) by the maximum thinner usage rate (gallons/hr);

iii. Multiply the maximum OC content of all the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr); and

iv. The sum of i thru iii.

Emission Limitation -

The OC emissions from this emissions unit shall not exceed 31.5 lbs/day.

Applicable Compliance Method -

The 31.5 lbs OC /day limitation was developed by multiplying the hourly emissions limit by the maximum operating schedule of 24 hours/day. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the daily limitation.

Emission Limitation:

The OC emissions from this emissions unit shall not exceed 4.18 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each coating and thinning solvent and mold release used in this emission unit multiplied by its OC content, in pounds per gallon, divided by 2000 pounds per ton, for each year.

Emission Limitation:

The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon, divided by 2,000 lbs/ton.

**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 - Energy Absorbing Foam Molding Line No. 1	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 5.92 lbs/hour and 15.0 tons per year (TPY).  See A.2.a
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V) OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).  The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.  See B.1.

**2. Additional Terms and Conditions**

- (a) The 5.92 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) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, 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). 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.
- 2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
- 3. The maximum mold release usage for this emissions unit shall not exceed 4,800 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 month for emissions units P001, P004, P005, P006, P007 and P008:
  - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
  - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
  - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
  - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
  - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
- 2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
  - a. The total annual mold release use, in gallons.
  - b. The total annual OC emissions from all mold release use, in tons.
- 3. The permit to install for this emissions unit (P004) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 2.89 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 431 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

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.).
4. 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.
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. All days when the OC content of the mold release used in this emissions unit exceeded 6.24 pounds of OC per gallon of mold release applied.
  - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
  - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted to the Ohio EPA 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 rolling 12 month mold release usage, in gallons.
  - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emissions limitations in section A.I.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 5.92 lbs/hour.

Applicable Compliance Method -  
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

Emission Limitation:

The OC emissions from this emissions unit shall not exceed 15.0 TPY.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

**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 - Energy Absorbing Foam Molding Line No. 2	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 8.98 lbs/hour and 15.0 tons per year (TPY).  See A.2.a
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).  The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-21-07(G)(2)	See B.1.

**2. Additional Terms and Conditions**

- (a) The 8.98 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) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, 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). 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.
- 2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.

3. The maximum mold release usage for this emissions unit shall not exceed 4,800 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 month for emissions units P001, P004, P005, P006, P007 and P008:
  - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
  - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
  - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
  - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
  - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
  - a. The total annual mold release use, in gallons.
  - b. The total annual OC emissions from all mold release use, in tons.

3. The permit to install for this emissions unit (P005) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.38 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 653 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

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.).
4. 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.
  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. All days when the OC content of the mold release used in this emissions unit exceeded 6.24 pounds of OC per gallon of mold release applied.
- b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
- c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted to the Ohio EPA 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 rolling 12 month mold release usage, in gallons.
  - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emissions limitations in section A.1.1. 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 8.98 lbs/hour.

Applicable Compliance Method -  
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 15.0 TPY.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

#### F. Miscellaneous Requirements

1. 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 - Energy Absorbing Foam Molding Line No. 8	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 7.61 lbs/hour and 20.6 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 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V) OAC rule 3745-21-07(G)(2)	The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions. See B.1.
<b>2. Additional Terms and Conditions</b>		
	(a)	The 7.61 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>B. Operational Restrictions</b>		
1.		The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, 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). 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.
2.		The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3.		The maximum mold release usage for this emissions unit shall not exceed 6,600 gallons based upon a rolling 12-month summation.
<b>C. Monitoring and/or Record Keeping Requirements</b>		
1.		The permittee shall collect and record the following information each month for emissions units P001, P004, P005, P006, P007 and P008:
	a.	The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
	b.	The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
	c.	The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
	d.	The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
	e.	The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2.		The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
	a.	The total annual mold release use, in gallons.
	b.	The total annual OC emissions from all mold release use, in tons.
3.		The permit to install for this emissions unit (P006) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's 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 summarizes the results of the modeling for the "worst case" pollutant(s):
		Pollutant: hydrocarbon naphtha
		TLV (mg/m3): 572,597 mg/m3
		Maximum Hourly Emission Rate (lbs/hr): 7.61 lbs/hr
		Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 553 ug/m3
		MAGLC (ug/m3): 5,726 ug/m3
		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.).
4. 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.
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. All days when the OC content of the mold release used in this emissions unit exceeded 6.24 pounds of OC per gallon of mold release applied.
  - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
  - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted to the Ohio EPA 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 rolling 12 month mold release usage, in gallons.
  - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emissions limitations in section A.1.1. 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 7.61 lbs/hour.

Applicable Compliance Method -  
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 20.6 TPY.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 0857043129 Emissions Unit ID: P007 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>
P007 - Energy Absorbing Foam Molding Line No. 3	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 5.80 lbs/hour and 15.0 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 3745-31-05(C).  The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.  See B.1.
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V) OAC rule 3745-21-07(G)(2)	

- 2. **Additional Terms and Conditions**
  - (a) The 5.80 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) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, 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). 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.
- 2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
- 3. The maximum mold release usage for this emissions unit shall not exceed 4,800 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 month for emissions units P001, P004, P005, P006, P007 and P008:
  - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
  - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
  - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.

- d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
  - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
- a. The total annual mold release use, in gallons.
  - b. The total annual OC emissions from all mold release use, in tons.

3. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 2.83 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 422 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

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.).
4. 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.
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. All days when the OC content of the mold release used in this emissions unit exceeded 6.24 pounds of OC per gallon of mold release applied.
  - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
  - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted to the Ohio EPA 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 rolling 12 month mold release usage, in gallons.
  - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emissions limitations in section A.1.1. 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 5.80 lbs/hour.
  - Applicable Compliance Method -  
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).
  - Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 15.0 TPY.
  - Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.
  - Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
  - Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

**F. Miscellaneous Requirements**

1. None

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

Facility ID: 0857043129 Emissions Unit ID: P008 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>
P008 - Energy Absorbing Foam Molding Line No. 9	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.75 lbs/hour and 6.18 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 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B)	The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY

(Synthetic minor to avoid non-attainment provisions and Title V) based upon a rolling, 12-month summation of the monthly OC emissions.  
 OAC rule 3745-21-07(G)(2) See B.1.

2. **Additional Terms and Conditions**

- (a) The 1.75 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) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, 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). 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.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 1,980 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 month for emissions units P001, P004, P005, P006, P007 and P008:
  - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
  - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
  - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
  - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
  - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
  - a. The total annual mold release use, in gallons.
  - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P008) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's 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 summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 1.75 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 260 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

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.).

4. 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.
  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. All days when the OC content of the mold release used in this emissions unit exceeded 6.24 pounds of OC per gallon of mold release applied.
    - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
    - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted to the Ohio EPA 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 rolling 12 month mold release usage, in gallons.
    - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
1. Compliance with the emissions limitations in section A.1.1. 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 1.75 lbs/hour.

Applicable Compliance Method -  
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 6.18 TPY.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007 and P008 shall not exceed 75.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -  
Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.
- F. Miscellaneous Requirements**
1. None