John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/16/2015

Certified Mail

Robert Hooper
IVEX Protective Packaging Inc. (Protec Pac USA)
456 S. Stolle Ave
P.O. Box 4699
Sidney, OH 45365-8846

Facility ID: 0575010238
Permit Number: P0116041
County: Shelby

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 1/27/2015. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Southwest District Office

Response to Comments

Facility ID:	0575010238
Facility Name:	IVEX Protective Packaging Inc. (Protec Pac USA)
Facility Description:	Polyolefin foam extrusion
Facility Address:	456 S. Stolle Avenue P.O. Box 4699 Sidney, OH 45365-8846 Shelby County
Permit:	P0116041, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Sidney Daily News on 01/28/2015. The comment period ended on 02/27/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Feb. 24, 2015, Yatendra Shah, Optim Environmental Resources, Inc. on behalf of IVEX

a. Comment: Noted a few minor typographical errors foam grinder title.

b. Response: SWDO agreed with comments and fixed typographical errors in both the permit terms and conditions and the facility profile. The facility is encouraged to update their facility profile through air services, as this is where permit document information is pulled from.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
IVEX Protective Packaging Inc. (Protec Pac USA)

Facility ID:	0575010238
Permit Number:	P0116041
Permit Type:	Renewal
Issued:	3/16/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
IVEX Protective Packaging Inc. (Protec Pac USA)

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Authorization

Facility ID:	0575010238
Facility Description:	Polyolefin foam extrusion
Application Number(s):	A0048612
Permit Number:	P0116041
Permit Description:	Renewal of the Title V permit for a polyolefin foam production that includes two extrusion lines, a foam scrap grinder and a degassing warehouse.
Permit Type:	Renewal
Issue Date:	3/16/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0088921

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

IVEX Protective Packaging Inc. (Protec Pac USA)
456 S. Stolle Avenue
P.O. Box 4699
Sidney, OH 45365-8846

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

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

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

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

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

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The overall combined volatile organic compound (VOC) emitted from this facility shall not exceed 240 tons per rolling 12-month period.

3. This facility shall maintain the following monthly records on all blowing agent materials employed in emissions units P001 and P002 and the combined VOC emissions from emissions unit P001, P002, P003, and P004:

   a) the amount of blowing agent employed, in tons;

   b) the 12-month rolling total amount of blowing agent employed, in tons per last 12-month period.

   c) the amount of VOC emitted in the enclosures of emissions units P001 and P002, in tons per month, [the amount of blowing agent utilized from d)(1)c. multiplied by percent emitted in the enclosure[1.]];

   d) the amount of VOC emitted from the incinerator vent, in tons per month, [the amount of: (c) multiplied by (1-percent control efficiency) [2.]];

   e) the amount of VOC emitted from emissions unit P003, the "off-gassing" warehouse, in tons per month;

   f) the amount of VOC emitted from P004, foam scrap grinder, in tons per month;

   g) the amount of combined VOC emitted, in tons per month,[the sum of: (d) + (e) + (f)];

   h) the total VOC emissions from all emissions units P001, P002, P003, and P004, in tons per rolling 12-month period [the sum of (total VOC emissions for the current month (g) plus the total VOC emission (g) for the 11 previous calendar months)].

   [1.] The amount of VOC emitted into the enclosure is required by this permit to be at least 50%. In the most recent stack test, on October 9, 2013, the actual percentage was determined to be 51.32%.

   [2.] The control efficiency of the thermal incinerator is required by this permit to be at least 98%. In the most recent stack test, October 9, 2013, the actual control efficiency was determined to be 99.1%.

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

   a) The overall combined volatile organic compound (VOC) emitted from this facility exceeds 240 tons per rolling 12-month period.

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

   [Authority for term: OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

C. Emissions Unit Terms and Conditions

1. P001, Foam extrusion line 1

Operations, Property and/or Equipment Description:

Foam extrusion line 1 with incinerator

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

(1) b)(1)g. and d)(5), below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The combined hourly stack volatile organic compound (VOC) emissions from emissions units P001 and P002 shall not exceed 2.6 pounds. See Section b(2)c. below.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions from natural gas and VOC combustion in the thermal oxidizer shall not exceed the following: 1.41 tons/yr nitrogen oxides (NOx); 0.53 ton/yr carbon monoxide (CO); 0.04 ton/yr particulate emissions (PE); 0.09 ton/yr volatile organic compound (VOC); and 0.13 ton/yr sulfur dioxide (SO2). See Section b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Sections b)(2)b. below.
d.	OAC rule 3745-31-05(D) (to avoid PSD)	The overall combined volatile organic compound (VOC) emitted from this facility is listed in the facility-wide terms and conditions in B.2. The recordkeeping and reporting requirements for this facility is specified in B.3 and B.4. Also See Sections c)(1), c)(2), c)(3), and d)(1), below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average. See Section f)(1)c., below
f.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for the fuel burning equipment. See Section f)(1)c. below
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below.
h.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections d)(2), d)(3),and e(1), below

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, and then these emission limitations/control measures no longer apply.

b. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan: The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NOx, CO, PE, VOC, and SO2 emissions from the thermal incinerator since the controlled potential to emit is less than 10 tons per year.

c. The combined hourly stack emission limitation of 2.6 pounds of volatile organic compound (VOC), from emissions units P001 and P002, is established to reflect the combined potential emissions from these two emissions units. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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

c) Operational Restrictions

(1) The permittee shall operate and maintain emissions units P001 and P002 in such a manner that will achieve an overall 50% capture of all volatile organic compounds, (VOC), in the blowing agents employed, minus the amount of VOC retained in the product.

[Authority for term: OAC rule 3745-31-05(D)]

(2) The volatile organic compound (VOC) emissions captured in this emissions unit's enclosure shall be vented to a control device that with a control efficiency of at least 98%.

[Authority for term: OAC rule 3745-31-05(D)]

(3) The combined blowing agent "utilized", (the employed blowing agent minus the amount retained in product) in emissions units P001 and P002 shall not exceed 575 tons per rolling 12 month period.

[Authority for term: OAC rule 3745-31-05(D)]

(4) The permittee shall burn only natural gas in the thermal oxidizer employed in this emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

(1) This facility shall maintain the following monthly records on all blowing agent materials employed in emissions units P001 and P002:

a. the amount of blowing agent employed, in tons;

b. the total amount of blowing agent retained in the facility products (RTP) during the month, in tons;

$$RTP = \sum_{i=1}^{n} Fpi \times (\frac{Pri}{100})$$

Where:

RTP = Retained in product, in tons;

n = Number of representative foam product grades produced during month;

Fpi = Quantity in tons of foam product "i" produced during month; and

Pri = Amount of blowing amount retained in representative foam product "i", in percent by weight.*

* The facility shall maintain all records and testing results that are the bases for the percent of blowing agent retained in product "n" for the product grade produced.

c. the amount of blowing agents "utilized", in tons, (the sum of: ("a" – "b")); and

d. the 12-month rolling total amount of blowing agent "utilized", in tons per last 12-month period.

[Authority for term: OAC rule 3745-31-05(D)]

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The acceptable temperature setting shall be based upon the manufacturer' s specifications until such time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of five years.

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

(3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 3-hour average.

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

(4) For each day during which the permittee burns a fuel other than natural gas in the thermal oxidizer, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

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

materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in :"a" or "b" (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

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

a. The combined blowing agent "utilized" in emissions units P001 and P002 exceeds 575 tons per rolling 12 month period.

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

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

Combined stack hourly VOC emission rate from emissions units P001 and P002 shall not exceed of 2.6 pounds

The allowable hourly emission rate is based on the following equation:

$HER = \{[(M_{P001} + M_{P002}) \times Cc] \times (1-Ce)\}$

Where:

HER = Hourly Emission Rate, in lbs of VOC/hr;

M_{P001} = Maximum hourly blowing agent usage rate in emissions unit P001, in lbs/hr, (96 lbs/hr);

M_{P002} = Maximum hourly blowing agent usage rate in emissions unit P002, in lbs/hr, (168 lbs/hr);

Cc = Capture of blowing agents within enclosures, in percent (%) by weight, (50%); and

Ce = Control efficiency, in percent (98%).

Applicable Compliance Method:

Compliance is based on the combined maximum production rate of emissions units P001 and P002. If in the future, either of these emissions units are modified to increase the maximum amount of blowing agent that can be employed, those changes will need to be reviewed under appropriate permitting requirements prior to initiation of the modifications.

Compliance will also be based on future stack tests as required in section f)(2).

b. Emission Limitation:

Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but shall not exceed 60 percent opacity, as a six-minute average, at any time.

Applicable Compliance Method:

When requested, the permittee shall demonstrate compliance through visible emission observations performed in accordance U.S. EPA Method 9.

c. Emission Limitation:

The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

When requested, the permittee shall conduct or have conducted a performance stack test demonstrate compliance with the 0.020 pound per million Btu of actual heat input. When requested performed in accordance U.S. EPA Method 1-5 in 40 CFR Part 60 Appendix A.

d. The emissions from natural gas and VOC combustion in the oxidizer shall not exceed the following:

1.41 tons/yr nitrogen oxides (NOx);

0.53 ton/yr carbon monoxide (CO);

0.04 ton/yr particulate emissions (PE);

0.09 ton/yr VOC; and

0.13 ton/yr sulfur dioxide (SO2).

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas or propane usage rate (1.53mmBtu/hr) by the higher of the emission factors* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98 (for natural gas) and Table 1.5-1, revised October 1996 (for propane).

* for NOx: 0.21 lb NOx/mmBtu; for CO, 0.08 lb CO/mmBtu; for PE, 0.007 lb PE/mmBtu; for VOC, 0.01 lb VOC/mmBtu; and for SO2, 0.017 lb SO2/mmBtu.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.

(2) The permittee shall conduct, or have conducted, emission testing(s) on the regenerative thermal oxidizer and the associated capture systems so as to demonstrate compliance with the above listed requirements.

a. The emission testing(s) for this emissions unit and/or facility shall be conducted within 6 months prior to the expiration of the operating permit in effect.

b. The emission testing(s) shall be conducted to demonstrate compliance with the required hourly stack emissions rate, destruction efficiency of the control device, and the capture requirements of the environmental chambers on emissions units P001 and P002.

c. The following test methods shall be employed to demonstrate compliance with the require efficiencies.

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

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

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

d. The test(s) shall be conducted while the emission units being controlled by the control device(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

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

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

g) Miscellaneous Requirements

(1) None.

2. P002, Foam extrusion line 2

Operations, Property and/or Equipment Description:

Foam extrusion line 2 with incinerator

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

(1) b)(1)f. and d)(5), below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The combined hourly stack volatile organic compound (VOC) emissions from emissions units P001 and P002 shall not exceed 2.6 pounds. See Section b)((2)c., below.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions from natural gas and VOC combustion in the thermal oxidizer shall not exceed the following: 1.41 tons/yr nitrogen oxides (NOx); 0.53 ton/yr carbon monoxide (CO); 0.04 ton/yr particulate emissions (PE); 0.09 ton/yr VOC; and 0.13 ton/yr sulfur dioxide (SO2). See Sections b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Sections b)(2)b. below.
d.	OAC rule 3745-31-05(D) (to avoid PSD)	The overall combined volatile organic compound (VOC) emitted from this facility is listed in the facility-wide terms and conditions in B.2. The recordkeeping and reporting requirements in section from this facility as specified in B.3 and B.4. Also See Sections c)(1), c)(2), c)(3), and d)(1), below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average. See Section f)(1)c., below
f.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for the fuel burning equipment. See Section f)(1)c. below
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below.
h.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections d)(2), d)(3) and e)(1) below

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, and then these emission limitations/control measures no longer apply.

b. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan: The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NOx, CO, PE, VOC, and SO2 emissions from the thermal incinerator since the controlled potential to emit is less than 10 tons per year.

c. The combined hourly stack emission limitation of 2.6 pounds of volatile organic compound (VOC), from emissions units P001 and P002, is established to reflect the combined potential emissions from these two emissions units. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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

c) Operational Restrictions

(1) The permittee shall operate and maintain emissions units P001 and P002 in such a manner that will achieve an overall 50% capture of all volatile organic compounds, (VOC), in the blowing agents employed, minus the amount of VOC retained in the product.

[Authority for term: OAC rule 3745-31-05(D)]

(2) The volatile organic compound (VOC) emissions captured in this emissions unit's enclosure shall be vented to a control device that with a control efficiency of at least 98%.

[Authority for term: OAC rule 3745-31-05(D)]

(3) The combined blowing agent "utilized", (the employed blowing agent minus the amount retained in product) in emissions units P001 and P002 shall not exceed 575 tons per rolling 12 month period.

[Authority for term: OAC rule 3745-31-05(D)]

(4) The permittee shall burn only natural gas in the thermal oxidizer employed in this emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

(1) This facility shall maintain the following monthly records on all blowing agent materials employed in emissions units P001 and P002:

a. the amount of blowing agent employed, in tons;

b. the total amount of blowing agent retained in the facility products (RTP) during the month, in tons;

$$RTP = \sum_{i=1}^{n} Fpi \times (\frac{Pri}{100})$$

Where:

RTP = Retained in product, in tons;

n = Number of representative foam product grades produced during month;

Fpi = Quantity in tons of foam product "i" produced during month; and

Pri = Amount of blowing amount retained in representative foam product "i", in percent by weight.*

* The facility shall maintain all records and testing results that are the bases for the percent of blowing agent retained in product "n" for the product grade produced.

c. the amount of blowing agents "utilized", in tons, (the sum of: ("a" – "b")); and

d. the 12-month rolling total amount of blowing agent "utilized", in tons per last 12-month period.

[Authority for term: OAC rule 3745-31-05(D)]

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of five years.

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

(3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 3-hour average.

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

(4) For each day during which the permittee burns a fuel other than natural gas in the thermal oxidizer, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

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

materials or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in :"a" or "b" (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

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

a. The combined blowing agent "utilized" in emissions units P001 and P002 exceeds 575 tons per rolling 12 month period.

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

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

Combined hourly stack VOC emission rate from emissions units P001 and P002 shall not exceed of 2.6 pounds

The allowable hourly emission rate is based on the following equation:

$HER= \{[(M_{P001} + M_{P002}) \times Cc] \times (1-Ce)\}$

Where:

HER = Hourly Emission Rate, in lbs of VOC/hr;

M_{P001} = Maximum hourly blowing agent usage rate in emissions unit P001, in lbs/hr, (96 lbs/hr);

M_{P002} = Maximum hourly blowing agent usage rate in emissions unit P002, in lbs/hr, (168 lbs/hr);

Cc = Capture of blowing agents within enclosures, in percent (%) by weight, (50%); and

Ce = Control efficiency, in percent (98%).

Applicable Compliance Method:

Compliance is based on the combined maximum production rate of emissions units P001 and P002. If in the future, either of these emissions units are modified to increase the maximum amount of blowing agent that can be employed, those changes will need to be reviewed under appropriate permitting requirements prior to initiation of the modifications.

Compliance will also be based on future stack tests as required in section f)(2).

b. Emission Limitation:

Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but shall not exceed 60 percent opacity, as a six-minute average, at any time.

Applicable Compliance Method:

When requested, the permittee shall demonstrate compliance through visible emission observations performed in accordance U.S. EPA Method 9.

c. Emission Limitation:

The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

When requested, the permittee shall conduct or have conducted a performance stack test demonstrate compliance with the 0.020 pound per million Btu of actual heat input. When requested performed in accordance U.S. EPA Method 1-5 in 40 CFR Part 60 Appendix A.

d. The emissions from natural gas and VOC combustion in the oxidizer shall not exceed the following:

1.41 tons/yr nitrogen oxides (NOx);

0.53 ton/yr carbon monoxide (CO);

0.04 ton/yr particulate emissions (PE);

0.09 ton/yr VOC; and

0.13 ton/yr sulfur dioxide (SO2).

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas or propane usage rate (1.53mmBtu/hr) by the higher of the emission factors* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98 (for natural gas) and Table 1.5-1, revised October 1996 (for propane).

* for NOx: 0.21 lb NOx/mmBtu; for CO, 0.08 lb CO/mmBtu; for PE, 0.007 lb PE/mmBtu; for VOC, 0.01 lb VOC/mmBtu; and for SO2, 0.017 lb SO2/mmBtu.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.

(2) The permittee shall conduct, or have conducted, emission testing(s) on the regenerative thermal oxidizer and the associated capture systems so as to demonstrate compliance with the above listed requirements.

a. The emission testing(s) for this emissions unit and/or facility shall be conducted within 6 months prior to the expiration of the operating permit in effect.

b. The emission testing(s) shall be conducted to demonstrate compliance with the required hourly stack emissions rate, destruction efficiency of the control device, and the capture requirements of the environmental chambers on emissions units P001 and P002.

c. The following test methods shall be employed to demonstrate compliance with the require efficiencies.

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

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

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

d. The test(s) shall be conducted while the emission units being controlled by the control device(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

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

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

g) Miscellaneous Requirements

(1) None.

3. P003, Warehouse emissions

Operations, Property and/or Equipment Description:

Warehouse emissions

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

(1) b)(1)c., and d)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The hourly volatile organic compound (VOC) emissions shall not exceed 105.6 pounds. See Sections b)(2)a., and f)(1)a., below.
b.	OAC rule 3745-31-05(D) (to avoid PSD)	The overall combined volatile organic compound (VOC) emitted from this facility is listed in the facility-wide terms and conditions in B.2. The recordkeeping and reporting requirements in section from this facility as specified in B.3 and B.4.
c.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(1), below.

(2) Additional Terms and Conditions

a. The hourly emission limitation of 105.6 pounds of volatile organic compound (VOC), from this emissions unit, is established to reflect the potential emission from this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term: OAC rule 3745(A)(3)]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

105.6 pounds of VOC per hour

The allowable hourly emission rate is based on the following equation:

$HER = \{[(M_{Lines}) \times Co] - [(M_{Lines}) \times 10\%^{1.}]\}$

Where:

HER = Hourly Emission Rate, in lbs of VOC/hr;

M_{Lines}= Maximum hourly blowing agent usage rate in emissions units P001 and P002, in lbs/hr, (264 lbs/hr);

Co = Amount of VOC carried over to warehouse/degassing area, in percent (%) by weight, (50%); and

1.= There is an estimated 10% of the overall blowing agent employed that is retained within the foam sheeting.

Applicable Compliance Method:

Compliance is based on the maximum production rate of emissions units P001 and P002, the assumed carry over into the degassing area, and the assumed amount of VOC's retained in foam sheeting.

If in the future, the production rates change and/or the above emission related assumptions are increased, this emissions unit will need to be exampled for possible required permit modifications due to updated emission determinations.

g) Miscellaneous Requirements

(1) None

4. P004, Foam Scrap Grinder

Operations, Property and/or Equipment Description:

Scrap grinder with incinerator

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

(1) b)(1)e, and d)(5), below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Use of and enclosure and thermal incinerator to reduce VOC emissions. The emissions from natural gas and VOC combustion in the oxidizer shall not exceed the following: 0.32 lb/hr and 1.41 tons/yr nitrogen oxides (NOx); 0.12 lb/hr and 0.53 ton/yr carbon monoxide (CO); 0.01 lb/hr and 0.04 ton/yr particulate emissions (PE); 0.02 lb/hr and 0.09 ton/yr VOC; and 0.03 lb/hr and 0.13 ton/yr sulfur dioxide (SO2). See Sections b)(2)a. below.
	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Sections b)(2)b. below.
b.	OAC rule 3745-31-05(D) (to avoid PSD)	The overall combined volatile organic compound (VOC) emitted from this facility is listed in the facility-wide terms and conditions in B.2. The recordkeeping and reporting requirements in section from this facility as specified in B.3 and B.4. Also See Section c)(1), below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average. See Section f)(1)c., below
d.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for the fuel burning equipment See Section f)(1)d., below
e.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below.
f.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections d)(1), d)(2), and e)(1), below

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, and then these emission limitations/control measures no longer apply.

b. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NOX, CO, PE, VOC, and SO2 emissions from the thermal incinerator since the controlled potential to emit is less than 10 tons per year, taking into consideration the federally enforceable limitation established under OAC rule 3745-31-05(D).

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

c) Operational Restrictions

(1) This emissions unit shall be equipped with a total enclosure and venting system that directs all volatile organic compound (VOC) emissions to the control device with a control efficiency of at least 98%.

[Authority for term: OAC rule 3745-31-05(D)]

(2) The permittee shall burn only natural gas and the emissions from the operations in the thermal oxidizer employed to control this emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of five years.

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

(2) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 3-hour average.

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

(3) For each day during which the permittee burns a fuel other than natural gas and/or emissions from the operations in the thermal oxidizer, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

(4) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and

obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

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

a. Each day when a fuel other than natural gas and/or operation emissions were burned in the thermal oxidizer controlling this emissions unit

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of this permit shall be

a. Emission Limitation:

Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but shall not exceed 60 percent opacity, as a six-minute average, at any time.

Applicable Compliance Method:

When requested, the permittee shall demonstrate compliance through visible emission observations performed in accordance U.S. EPA Method 9.

b. Emission Limitation:

The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

When requested, the permittee shall conduct or have conducted a performance stack test demonstrate compliance with the 0.020 pound per million Btu of actual heat input. When requested performed in accordance U.S. EPA Method 1-5 in 40 CFR Part 60 Appendix A.

c. The emissions from natural gas and VOC combustion in the oxidizer shall not exceed the following:

1.41 tons/yr nitrogen oxides (NOx);

0.53 ton/yr carbon monoxide (CO);

0.04 ton/yr particulate emissions (PE);

0.09 ton/yr VOC; and

0.13 ton/yr sulfur dioxide (SO2).

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas or propane usage rate (1.53mmBtu/hr) by the higher of the emission factors* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98 (for natural gas) and Table 1.5-1, revised October 1996 (for propane).

* for NOx: 0.21 lb NOx/mmBtu; for CO, 0.08 lb CO/mmBtu; for PE, 0.007 lb PE/mmBtu; for VOC, 0.01 lb VOC/mmBtu; and for SO2, 0.017 lb SO2/mmBtu.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.

(2) The permittee shall conduct, or have conducted, emission testing(s) on the regenerative thermal oxidizer and the associated capture systems so as to demonstrate compliance with the above listed requirements.

a. The emission testing(s) for this emissions unit and/or facility shall be conducted within 6 months prior to the expiration of the operating permit in effect.

b. The emission testing(s) shall be conducted to demonstrate compliance with the require destruction of efficiency of the control device and the total enclosure requirements of emissions unit P004.

c. The following test methods shall be employed to demonstrate compliance with the require efficiencies.

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

Capture Efficiency of the total enclosure: The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use

of the alternative if such approval does not contravene any other applicable requirement.)

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

d. The test(s) shall be conducted while the emission units being controlled by the control device(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

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

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

g) Miscellaneous Requirements

(1) None.