Ohio Environmental Protection Agency

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

7/1/2015

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Joe Jones
Johnson Controls Inc.
1147 North Washington Street
Greenfield, OH 45123

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0536010034
Permit Number: P0117839
Permit Type: Initial Installation
County: Highland

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SWDO

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Johnson Controls Inc.

Facility ID:	0536010034
Permit Number:	P0117839
Permit Type:	Initial Installation
Issued:	7/1/2015
Effective:	7/1/2015
Expiration:	7/1/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Johnson Controls Inc.

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Authorization

Facility ID:	0536010034
Application Number(s):	A0051444, A0052565
Permit Number:	P0117839
Permit Description:	Issuing permit to transition the facility from Title V to FEPTIO status.
Permit Type:	Initial Installation
Permit Fee:	$300.00
Issue Date:	7/1/2015
Effective Date:	7/1/2015
Expiration Date:	7/1/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

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

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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 this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0117839
Permit Description: Issuing permit to transition the facility from Title V to FEPTIO status.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P009**
Company Equipment ID:	Adhesive Repair L1&2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Polyurethane foam molding line

Emissions Unit ID:	**P005**
Company Equipment ID:	Foam Line 2
Superseded Permit Number:	P0107662
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	Foam Line 1
Superseded Permit Number:	P0107662
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The emissions of volatile organic compound (VOC) emissions from this facility shall be less than or equal to 95.0 tons per year (TPY), based upon rolling, 12-month summations. The emission units included in this facility-wide limitation are: P005, P007, and P009.

3. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than or equal to 9.0 tons per year (TPY) for any individual HAP and 24.0 TPY for the combination of all HAPs, based upon rolling, 12-month summations. The emission units included in this facility-wide limitation are: P005, P007, and P009.

4. The permittee shall collect and record the following information each month for this facility:

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed during the previous calendar month;

   e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);

   f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and

   i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

The permittee shall have the option of using the potential to emit in place of the recordkeeping described in B.3. for any "de minimis" or exempt emissions unit for purposes of complying with the facility-wide HAP(s) limitations. Furthermore, the permittee shall have the flexibility to use purchasing records in lieu of recordkeeping requirement as stated in B.3.d) for purposes of complying with the facility-wide HAP(s) limitations.

5. The permittee shall calculate and maintain monthly records of the following for this emissions unit:

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

      Es = {(Us) x [1 - (CE x DE)]}/2000

      Where:

      Es = the monthly VOC emission rate for the spray mold release agent, in tons;

      Us = the monthly spray mold release agent VOC usage, in pounds;

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

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

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

      Ep = (Up)

      Where:

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

      Up = the monthly paste mold release agent VOC usage, in pounds (from d)(2)i. above).

   c) the total VOC emission rate, in tons, (= 5.a). + 5.b).); and

   d) the rolling, 12-month period paste mold release agent VOC usage [i.e., the summation of the each month, as recorded in 5.c)., for the present month plus 5.c)) for the previous 11 months of operation], in ton(s)..

6. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

   a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

      (1) The rolling 12 individual VOC emissions is greater than 95.0 tons from this facility;

      (2) The rolling 12 individual HAP emissions is greater than 9.0 tons from this facility; and

(3) The rolling 12 month combined HAP's emissions are greater than 24.0 tons from this facility.

b) the probable cause of each deviation (excursion);

c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Polyurethane foam molding line: P005,P007,

EU ID	Operations, Property and/or Equipment Description
P005	Polyurethane foam molding line 2
P007	Polyurethane foam molding line 1

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d., d)(5), d)(6), and d)(7), below.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 9.47 pounds per hour, each Particulate emissions (PE) shall not exceed 0.53 pounds per hour or 2.32 tons per year, each. Visible PE from the stack shall not exceed 10% opacity, except during clean out During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity. See b)(2)a, below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rules 3745-17-07(A) and 3745-17-11(B)	b)(2)b, below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor Limitations to avoid Title V requirements)	VOC emissions shall not exceed 41.5 tons as a rolling, 12-month summation, each. The facility-wide VOC and HAP(s) apply to this emissions unit. The facility-wide for VOC and HAP(s) are listed in the facility-wide terms and conditions in section B. of this permit. The recordkeeping requirements in section d) contribute to the calculation of the total VOC and HAP(s) emissions from this facility as specified in section B. of this permit. See c)(1) and c)(2), below.
d.	OAC rule 3745-114-01	Ohio Toxic Rule.

(2) Additional Terms and Conditions

a. The 9.47 lbs. VOC per hour and the 0.53 lbs. PE per hour limitations each are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.

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

c. Each emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable. None.

c) Operational Restrictions

(1) The VOC emissions from the spray mold release agents for each emissions unit shall be vented to a thermal oxidizer with a minimum capture efficiency of 85%, by weight, for VOC.

(2) The VOC emissions from the spray mold release agents for each emissions unit shall be vented to a thermal oxidizer with a minimum destruction efficiency of 95%, by weight, for VOC.

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

(4) The maximum annual spray mold release agent VOC usage for each emissions unit shall not exceed 200 tons, based upon a rolling, 12-month summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

(5) The maximum annual paste mold release agent VOC usage for each emissions unit shall not exceed 3.0 tons, based upon a rolling, 12-month summation of the paste mold release agent usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

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

(6) The permittee shall operate a metal mesh filter system to control PE whenever one or both emissions units are in operation.

d) Monitoring and/or Recordkeeping Requirements

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

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

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

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

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

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

b. the spray mold release agent usage for each month, in pounds;

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

d. the spray mold release agent VOC usage for each month, in pounds (= d)(2)(b. x d)(2)c.);

e. the rolling, 12-month period spray mold release agent VOC usage [i.e., the summation of the each month, as recorded in d)(2)d., for the present month plus (d)(2)d.) for the previous 11 months of operation], in ton(s).

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

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

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

i. the paste mold release agent VOC usage for each month, in pounds (= d)(2)g. x d)(2)h.); and

j. the rolling, 12-month period paste mold release agent VOC usage [i.e., the summation of the each month, as recorded in d)(2)j., for the present month plus (d)(2)i.) for the previous 11 months of operation], in ton(s).

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

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

Es = {(Us) x [1 - (CE x DE)]}/2000

Where:

Es = the monthly VOC emission rate for the spray mold release agent, in tons;

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

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

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

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

Ep = (Up)

Where:

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

Up = the monthly paste mold release agent VOC usage, in pounds (from d)(2)i. above).

c. the total VOC emission rate, in tons, (= d)(3)a. + d)(3)b.); and

d. the rolling, 12-month period paste mold release agent VOC usage [i.e., the summation of the each month, as recorded in d)(3)c., for the present month plus (d)(3)c.) for the previous 11 months of operation], in ton(s)..

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

(5) The permit to install for emissions units P005 and P007 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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

TLV (ug/m3): 200,000

Maximum hourly emission rate (lbs/hr): 12.1

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

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

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

TLV (ug/m3): 35.6

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

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

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

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

TLV (ug/m3): 2,000

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

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

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

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

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

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

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

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. a documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

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

ii. any exceedances of the rolling, 12-month spray mold release agent usage rate of 200 tons for each unit;

iii. any exceedances of the rolling, 12-month paste mold release agent usage rate of 3.0 tons for each unit; and

iv. any exceedances of the rolling, 12-month VOC emission limitation of 41.50 tons for each unit.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

(2) The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing the following:

a. any time that the panel metal mesh filter system serving as PE control for either or both emissions units were not in service when the emissions unit(s) was/were in operation; and

b. any time that the capture (collection) system, control device, and monitoring equipment, were not in service when the associated emissions unit(s) was/were in operation..

The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation: 9.47 pounds VOC per hour, each

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

Evoc = (Us) x [1 - (CE x DE)] + (Up)

Where:

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

Us = the maximum hourly spray release agent VOC usage rate (45.66 lbs, each);

(CE x DE) = the capture efficiency multiplied by the destruction efficiency, (Minimum value for CE = 85% and DE = 95%. Stack test from January 17 and 18, 2007, capture efficiency was determined to be 91.1% and destruction efficiency was determined to be 96.87%); and

Up = the maximum hourly paste release agent VOC usage rate (0.685 lbs., each).

Applicable Compliance Method:

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

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

b. Emission Limitation:

41.50 tons VOC per rolling, 12-month summation, each

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements established in section d), of this permit.

c. Emission Limitations:

0.53 pound PE per hour, each unit

2.32 tons PE per year, each unit

The hourly PE limitation was established as follows:

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

Where:

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

Us = the maximum hourly spray release agent usage rate (48.07 lbs/hr, each);

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

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

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

Applicable Compliance Method:

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

The annual PE limitation was established as follows:

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

Where:

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

Aspray = the maximum annual spray release agent usage rate (210.5 tons/year, each);

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

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

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

d. Visible Emission Limitation:

10% opacity from the stack

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

Applicable Compliance Method:

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

e. Emission Limitation:

The VOC emissions from the spray mold release agents for each emissions unit shall be vented to a thermal oxidizer with a minimum capture efficiency of 85% and a minimum destruction efficiency of 95%, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control efficiency requirement above shall be demonstrated based on the results of emission tests conducted in accordance with the most recent emissions test.

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

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

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

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

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

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

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

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

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

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

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

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

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

g) Miscellaneous Requirements

(1) None.

2. P009, Repair Line

Operations, Property and/or Equipment Description:

Polyurethane foam repair line

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b., and d)(2), below None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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(F) (Voluntary limitation in order to eliminate old BAT allowable of 11.5 tons of VOC and assure facility does not trigger Title V requirements)	Volatile organic compound (VOC) emissions shall not exceed de minimis emissions as determined in OAC rule 3745-15-05.
b.	OAC rule 3745-114-01	Ohio Toxic Rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain all appropriate records as required under OAC rule 3745-15-05, based on the daily "uncontrolled" potential emissions from this emissions unit and the de minimis emissions' thresholds.

If the "uncontrolled" potential emissions from this emissions unit is at or below the de minimis emissions' thresholds, no records are require.

(2) 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 FEPTIO 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 FEPTIO.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedances of the "de minimis" emission thresholds.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

None.

g) Miscellaneous Requirements

(1) None.