



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

2/8/2016

Certified Mail

KATHY BASSETT  
 DAYTON MOLDED URETHANES, LLC  
 3337 NORTH DIXIE DRIVE  
 DAYTON, OH 45414

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0857043129  
 Permit Number: P0119836  
 Permit Type: Initial Installation  
 County: Montgomery

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Regional Air Pollution Control Agency  
 117 South Main Street  
 Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

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



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Dayton Molded Urethanes, LLC operates a polyurethane foam products manufacturing facility in Dayton, Ohio (Montgomery County) and is currently classified as a synthetic minor facility for volatile organic compounds (VOC) emissions to avoid Title V permitting. In the polyurethane foam manufacturing process, mold release solution is sprayed into the mold prior to filling it with the two part mixture of polyurethane resin and isocyanate. VOC emissions result from the application of the mold release into the mold.

Dayton Molded Urethanes currently operates 5 permitted foam molding lines, P004 - P009, which are permitted under Federally Enforceable Permit to Install and Operate (FEPTIO) P0116747. P0116747 includes a federally enforceable limit on VOC emissions from the mold release used in all emissions units at the facility to 75.8 tons on a rolling 12-month basis.

On November 9, 2015, Dayton Molded Urethanes submitted an application for the installation of two additional foam molding lines, P011 and P012. As a result, the facility has requested to increase their facility-wide synthetic minor VOC emissions limit from 75.8 TPY to 97.11 TPY. This permit is being processed as an initial installation permit. Additionally, emissions units P004 - P009 will be permitted in FEPTIO P0119897 which is being processed as a Chapter 31 modification due to the facility wide increase in potential VOC emissions. Per OEPA guidance, initial installation permits and Chapter 31 modifications must be issued as separate permit actions.

3. Facility Emissions and Attainment Status:

Dayton Molded Urethanes is located in Montgomery County which is currently designated as attainment with the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. Dayton Molded Urethanes is currently classified as a synthetic minor source for Title V permit requirements by limiting potential VOC emissions to less than 75.8 tons on a rolling 12-month basis. With the installation of the new foam molding lines, Dayton Molded Urethanes will continued to be classified as a synthetic minor source for Title V permit requirements by limiting potential VOC emissions to less than 97.11 tons on a rolling 12-month basis.

4. Source Emissions:

The potential VOC emissions from Dayton Molded Urethanes are presented in the following table:

Potential Air Emissions										
Emissions Unit	P001	P004	P005	P006	P007	P008	P009	P011	P012	Total
VOC (tons per year)	1.83	55.20	55.20	55.20	55.20	41.39	41.39	41.39	55.20	401.95

Dayton Molded Urethanes is potentially a major source of VOC emissions as defined by Title V. Dayton Molded Urethanes is not a major source of combined HAP or individual HAP emissions (no HAPs are used). Therefore, Dayton Molded Urethanes has already established federally enforceable operating restrictions on VOC usage to prevent triggering major source permitting requirements. A rolling 12-month VOC emissions limitation of 75.8 tons was established in FEPTIO P0116747.



As part of this application Dayton Molded Urethanes has proposed a mold release usage restriction of 30,250 gallons per year for the foam molding production lines as a rolling 12-month limit.

The limited VOC emissions from Dayton Molded Urethanes are presented in the following table:

Limited Air Emissions										
Emissions Unit	P001 <sup>1</sup>	P004	P005	P006	P007	P008	P009	P011	P012	Total
VOC (tons per year)	1.83									97.11

Note 1: Emissions unit P001 is a laboratory line and is currently classified as de minimis.

Note 2: The 95.28 TPY VOC limit is a result of the maximum annual mold release usage (30,250 gallons/yr) and the maximum VOC content of the mold release (6.30 lbs VOC/gal).

5. **Conclusion:**  
 By limiting the annual mold release usage to 30,250 gallons per year, Dayton Molded Urethanes will continue to be classified as a synthetic minor facility for VOC emissions. This federally enforceable PTIO will VOC emissions from all emissions units at the facility to 97.11 tons on a rolling 12-month basis to avoid Title V permitting requirements.
  
6. Please provide additional notes or comments as necessary:  
  
 None
  
7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>97.11</u>

## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation

DAYTON MOLDED URETHANES, LLC

3337 NORTH DIXIE DRIVE,, Dayton, OH 45414

ID#:P0119836

Date of Action: 2/8/2016

Permit Desc:Initial installation PTIO for two polyurethane foam molding lines.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Cathy Oneill, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
DAYTON MOLDED URETHANES, LLC**

Facility ID:	0857043129
Permit Number:	P0119836
Permit Type:	Initial Installation
Issued:	2/8/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control  
Permit-to-Install and Operate**  
for  
DAYTON MOLDED URETHANES, LLC

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
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? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	13
1. Emissions Unit Group -mold lines: P011,P012, .....	14





**Draft Permit-to-Install and Operate**  
DAYTON MOLDED URETHANES, LLC  
**Permit Number:** P0119836  
**Facility ID:** 0857043129

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0857043129  
Application Number(s): A0054571  
Permit Number: P0119836  
Permit Description: Initial installation PTIO for two polyurethane foam molding lines  
Permit Type: Initial Installation  
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 2/8/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

DAYTON MOLDED URETHANES, LLC  
3337 NORTH DIXIE DRIVE  
Dayton, OH 45414

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:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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



Draft Permit-to-Install and Operate  
DAYTON MOLDED URETHANES, LLC  
Permit Number: P0119836  
Facility ID: 0857043129

Effective Date: To be entered upon final issuance

## Authorization (continued)

Permit Number: P0119836

Permit Description: Initial installation PTIO for two polyurethane foam molding lines

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

**Group Name: mold lines**

<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	EA Foam Molding Line 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	EA Foam Line 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
DAYTON MOLDED URETHANES, LLC

**Permit Number:** P0119836

**Facility ID:** 0857043129

**Effective Date:** To be entered upon final issuance

## **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 Regional Air Pollution Control Agency 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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



**Draft Permit-to-Install and Operate**  
DAYTON MOLDED URETHANES, LLC

**Permit Number:** P0119836

**Facility ID:** 0857043129

**Effective Date:** To be entered upon final issuance

## **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) B.2. through B.6.
  
2. Dayton Molded Urethanes, LLC has requested the following limits to volatile organic compound (VOC) emissions to avoid Title V permitting and Major New Source Review for all foam molding lines combined.
  - a) Emissions of VOCs shall not exceed 97.11 tons per year (TPY), based upon a rolling, 12-month summation of monthly emissions.
  - b) The annual usage of mold release from all of the foam molding lines combined shall not exceed 30,250 gallons per year, based on a rolling 12-month summation.
  - c) To ensure enforceability with the 97.11 TPY VOC limit during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of 97.11 (Tons)
1	8.00
1-2	16.00
1-3	24.00
1-4	32.00
1-5	40.00
1-6	48.00
1-7	56.00
1-8	64.00
1-9	72.00



**Effective Date:** To be entered upon final issuance

1-10	80.00
1-11	88.00
1-12	97.11

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- d) To ensure enforceability with the 30,250 gallons per year limit during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Mold Release Usage (gallons)
1	2,520
1-2	5,040
1-3	7,560
1-4	10,080
1-5	12,600
1-6	15,120
1-7	17,640
1-8	20,160
1-9	22,680
1-10	25,200
1-11	27,720
1-12	30,250

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling, 12-month summation of the mold release usage figures.

- 3. In order to determine compliance with the limitations in 2 above, the permittee shall comply with the following operational restriction:
  - a) The VOC content of mold release shall not exceed 6.3 lbs VOC/gal coating.

4. In order to determine compliance with the limitations in 2 above, the permittee shall maintain monthly records of the following information for each foam molding line:
- a) The identification of each mold release, as applied in each emissions unit;
  - b) The VOC content of each mold release, in pounds of VOC per gallon;
  - c) The volume, in gallons, of each mold release, applied in each emissions unit (calculated according to the applicable PTIO for each emissions unit);
  - d) The total VOC emissions for all mold release, applied, in tons per month from each emissions unit [the sum of 4.b) x 4.c)] for each mold release divided by 2,000 lbs/ton;
  - e) The combined VOC emission rate for all foam molding lines combined, (the sum of the monthly VOC emissions rates from 4.d) for all the emissions units);
  - f) Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling 12-month VOC emissions rate, in tons, for all foam molding lines combined (the sum of the VOC emissions calculated according to 4.b) for the previous 12-months).

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.

- g) The combined volume in gallons of mold release for all foam molding lines combined, (the sum of the monthly mold release usage rates for all the emissions units);
- h) Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the mold release usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative mold release usage for each calendar month.

5. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, of the following information:
- a) An identification of each month during which the VOC content of each mold release exceeded the 6.3 lbs VOC/gal coating limitation.
  - b) An identification of each month during which the rolling, 12-month VOC emissions rate exceeds 97.11 tons on a rolling 12-month basis for all foam molding lines combined and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
  - c) An identification of each month during which the rolling, 12-month mold release usage rate exceeds 30,250 gallons on a rolling 12-month basis for all foam molding lines combined and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage.

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). Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

6. Compliance with the emission limitations in B.2. of these terms and conditions shall be determined in accordance with the following methods:

a) Emission Limitation -

The VOC emissions from all of the foam molding lines shall not exceed 97.11 tons on a rolling 12-month summation.

The annual usage of mold release from all of the foam molding lines combined shall not exceed 30,250 gallons per year, based on a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in B.4.

7. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart OOOOOO, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Industry Area Source. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



**Draft Permit-to-Install and Operate**  
DAYTON MOLDED URETHANES, LLC

**Permit Number:** P0119836

**Facility ID:** 0857043129

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group -mold lines: P011,P012,**

EU ID	Operations, Property and/or Equipment Description
P011	Polyurethane Foam Molding Line 6
P012	Polyurethane Foam Molding Line 7

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. 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. b)(1)b.

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)	<p><u>Emissions Unit P011:</u> The amount of mold release agents employed in this emissions unit shall not exceed 167 gallons /month averaged over a 12 month rolling period.</p> <p><u>Emissions Unit P012:</u> The amount of mold release agents employed in this emissions unit shall not exceed 584 gallons /month averaged over a 12 month rolling period.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and being a major stationary source	See B.2. through B.6.

- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month for each emissions unit:
    - a. The identification of each mold release, as applied in each emissions unit.
    - b. The volume, in gallons, of each mold release, applied in each emissions unit.
    - c. The average monthly mold release usage over a 12-month period, i.e., the total mold release usage for the present month plus the previous 11 months, in gallons, divided by 12 months.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) 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 of an 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.
- 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. Emissions Limitation

Monthly average mold release usage shall not exceed the following for each emissions unit, averaged over a 12-month rolling period:

P011            167 gallons

P012            584 gallons

Applicable Compliance Method

Compliance with the mold release usage limitations shall be demonstrated by the recordkeeping in d)(1).

g) Miscellaneous Requirements

(1) None.