



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PORTAGE COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 16-02250

DATE: 10/24/2002

Smithers-Oasis USA
Kevin Kilroy
919 Marvin Avenue
Kent, OH 44240

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 10/24/2002
Effective Date: 10/24/2002**

FINAL PERMIT TO INSTALL 16-02250

Application Number: 16-02250
APS Premise Number: 1667040037
Permit Fee: **\$600**
Name of Facility: Smithers-Oasis USA
Person to Contact: Kevin Kilroy
Address: 919 Marvin Avenue
Kent, OH 44240

Location of proposed air contaminant source(s) [emissions unit(s)]:
919 Marvin Avenue
Kent, Ohio

Description of proposed emissions unit(s):
Modification to existing equipment increasing potential production capacity, addition of a new emissions unit, and federally enforceable operating hours restriction to cap PTE.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. 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 are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. 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.

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5. 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.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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 permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

7. 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. The permittee shall pay all applicable Permit To Install fees

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within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, 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:
 - i. 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.
 - ii. 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 ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air agency 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:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM10	8.54

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Applicable Emissions
Limitations/Control
Measures

are PM10 emissions.

5% opacity from any stack,
as a 6-minute average

There shall be no visible
particulate emissions from
building ventilation.

1.44 pounds/hour of PM
(Grower 2A)

1.44 pounds/hour of PM
(Grower 2B)

See Part III, sections A.I.2
and A.II.1 below for
additional requirements of
OAC rule 3745-31-05(A)(3).

7.34 tons/year of PM*
(combined for Grower 2A
and Grower 2B), based upon
a rolling, 12-month
summation of the monthly
emissions, limited by the
federally enforceable
operating hours restriction of
Part III, section A.II.2

The emissions limitations
specified by these rules are
less stringent than the
emissions limitations
established pursuant to OAC
rule 3745-31-05(A)(3).

*assume all PM emissions

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2. Additional Terms and Conditions

2.a The 1.44 pounds/hour PM emissions limits regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures for each Grower 2A and Grower 2A operation. Therefore, no associated record keeping or reporting are required to demonstrate compliance with this emissions limit.

However, if any proposed change(s), such as with production capacity, process materials, the fabric filter system(s) and/or associated control equipment, or anything else that increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee shall properly install (or have properly installed), adjust, operate, and maintain fabric filter systems (or comparable air pollution control device), and associated control equipment (i.e., hoods, enclosures, ductwork, and fans, etc.), and any other equipment necessary to capture, contain, and vent air emissions of particulate matter to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.

2.c Scrap process materials shall be properly disposed of, and any spillage of foam dust from the fabrication operations, or cleaning/maintenance of the fabric filter system and associated control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed in the facility, as needed, to minimize or eliminate emissions of fugitive dust.

2.d The emissions of PM from this emissions unit shall not exceed 7.34 tons/year (combined for Grower 2A and Grower 2B), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table (combined for Grower 2A and Grower 2B):

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of PM (Tons)</u>
1	2.45
1-2	3.06

1-3	3.67
1-4	4.28
1-5	4.89
1-6	5.50
1-7	6.12
1-8	6.73
1-9	7.34
1-10	7.34
1-11	7.34
1-12	7.34

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

II. Operational Restrictions

1. The fabric filter systems and associated control equipment serving this emissions unit shall be employed all times the emissions unit is in operation.
2. The maximum annual operating hours for each of Grower 2A & Grower 2B of this emissions unit shall not exceed 5100, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Grower 2A Maximum Allowable Cumulative Operating Hours</u>	<u>Grower 2B Maximum Allowable Cumulative Operating Hours</u>
1	1700	1700
1-2	2125	2125
1-3	2550	2550
1-4	2975	2975
1-5	3400	3400
1-6	3825	3825
1-7	4250	4250
1-8	4675	4675
1-9	5100	5100
1-10	5100	5100
1-11	5100	5100
1-12	5100	5100

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After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitations shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter system(s) and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from the fabric filter system(s) and/or associated control equipment serving this emissions unit. The presence or absence of any visible particulate emissions shall be noted daily in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emission.
3. The permittee shall maintain monthly records of the following information for the emissions unit:
 - a. The operating hours for each month for each of Grower 2A & Grower 2B.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly operating hours for each of Grower 2A & Grower 2B.
 - c. The monthly PM emissions for each month.
 - d. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly PM emissions.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours, for each of Grower 2A & Grower 2B, and PM emissions for each calendar month.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter system(s) and/or associated control equipment serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any abnormal visible particulate emissions were observed from the fabric filter system(s) and/or associated control equipment and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation of the operating hours restriction, for each of Grower 2A & Grower 2B and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels, for each of Grower 2A & Grower 2B, as well as the corrective actions that were taken to achieve compliance.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation of the PM emissions limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative PM emissions levels, as well as the corrective actions that were taken to achieve compliance.
5. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 1.44 pounds/hour of PM (Grower 2A)

Applicable Compliance Method: The above PM emissions limitation was established as specified in the equation below:

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$H = V \times O \times (60 \text{ minutes/hour}) \times (1 \text{ pound}/7000 \text{ grains});$

Where,

H = 1.44 pounds/hour of PM [hourly controlled potential emissions for Grower 2A];
 V = 5600 DSCFM [maximum fabric filter system exhaust flow for Grower 2A]; and
 O = 0.030 grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].

DSCFM = dry standard cubic feet per minute

- c. Emission Limitation: 1.44 pounds/hour of PM (Grower 2B)

Applicable Compliance Method: The above PM emissions limitation was established as specified in the equation below:

$$H = V \times O \times (60 \text{ minutes/hour}) \times (1 \text{ pound}/7000 \text{ grains});$$

Where,

H = 1.44 pounds/hour of PM [hourly controlled potential emissions for Grower 2B];
 V = 5600 DSCFM [maximum fabric filter system exhaust flow for Grower 2B]; and
 O = 0.030 grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].

DSCFM = dry standard cubic feet per minute

- d. Emission Limitation: No visible particulate emissions from building ventilation

Applicable Compliance Method: USEPA Method 22, 40 CFR Part 60, Appendix A.

- e. Emission Limitation: 7.34 tons/year of PM (combined for Grower 2A and Grower 2B), based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method: The above PM emissions limitation was established as specified in the equation below:

$$Y = H \times T \times (1 \text{ ton}/2000 \text{ pounds});$$

Where,

Y = 7.34 tons/year of PM (combined for Grower 2A and Grower 2B)[yearly controlled federally enforceable emissions];

H = 2.88 pounds/hour of PM (combined for Grower 2A and Grower 2B)[hourly

controlled potential emissions]; and
T = 5100 hours/year [federally enforceable operating hours restriction].

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VI. Miscellaneous Requirements

1. Permit to Install (PTI) 16-02250 supersedes all of the requirements of PTI 16-679 (issued 8/31/88) and PTI 16-680 (issued 10/27/88) for any and all parts of this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 (Speciality Grower Foam Shaping Units) fabrication (cutting/shaping operations) of grower and other speciality foam buns into miscellaneous shaped consumer products, air emissions of particulate matter (PM) well-captured/contained (each Grower 2A and Grower 2B fabrication operation hooded) and vented to and controlled by one of two fabric filter system. (modification see term A.VI.1)	Air Toxic Policy	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

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Emissions Unit ID: P018

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 (Speciality Styrofoam Shaping Units) fabrication (cutting/shaping operations) of styrofoam into miscellaneous shaped consumer products, air emissions of particulate matter (PM) well-captured/contained (each fabrication operation hooded) and vented to and controlled by a fabric filter system.	OAC rule 3745-31-05(A)(3) OAC rule 3745-31-05(D) OAC rule 3745-17-07(A) OAC rule 3745-17-07(B) OAC rule 3745-17-08(B) OAC rule 3745-17-11(B)	5% opacity from any stack, as a 6-minute average There shall be no visible particulate emissions from building ventilation. 1.44 pounds/hour of PM See Part III, sections A.I.2 and A.II.1 below for additional requirements of OAC rule 3745-31-05(A)(3). 1.20 tons/year of PM*, based upon a rolling, 12-month summation of the monthly emissions, limited by the federally enforceable operating hours restriction of Part III, section A.II.2 The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3). *assume all PM emissions are PM10 emissions.

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2. Additional Terms and Conditions

- 2.a** The 1.44 pounds/hour PM emissions limit regulated per OAC rule 3745-31-05(A)(3) is based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with this emissions limit.

However, if any proposed change(s), such as with production capacity, process materials, the fabric filter system and/or associated control equipment, or anything else that increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** The permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter system (or comparable air pollution control device), and associated control equipment (i.e., hoods, enclosures, ductwork, and fans, etc.), and any other equipment necessary to capture, contain, and vent air emissions of particulate matter to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- 2.c** Scrap process materials shall be properly disposed of, and any spillage of foam dust from the fabrication operations, or cleaning/maintenance of the fabric filter system and associated control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed in the facility, as needed, to minimize or eliminate emissions of fugitive dust.
- 2.d** The emissions of PM from this emissions unit shall not exceed 1.20 tons/year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of PM (Tons)</u>
1	0.10
1-2	0.20

1-3	0.30
1-4	0.40
1-5	0.50
1-6	0.60
1-7	0.70
1-8	0.80
1-9	0.90
1-10	1.00
1-11	1.10
1-12	1.20

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

II. Operational Restrictions

1. The fabric filter system and associated control equipment serving this emissions unit shall be employed all times the emissions unit is in operation.
2. The maximum annual operating hours for this emissions unit shall not exceed 1664, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	139
1-2	277
1-3	416
1-4	555
1-5	693
1-6	832
1-7	971
1-8	1109
1-9	1248
1-10	1387

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1-11	1525
1-12	1664

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the fabric filter system and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from the fabric filter system and/or associated control equipment serving this emissions unit. The presence or absence of any visible particulate emissions shall be noted daily in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in an operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the determined cause of the abnormal emissions if a cause can be determined upon investigation;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emission.
3. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly operating hours.
 - c. The monthly PM emissions for each month.
 - d. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly PM emissions.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours and PM emissions for each calendar month.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter system and/or associated control equipment serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District

Office or local air agency) within 30 days after the event occurs.

2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any abnormal visible particulate emissions were observed from the fabric filter system and/or associated control equipment and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation of the operating hours restriction and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels, as well as the corrective actions that were taken to achieve compliance.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation of the PM emissions limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative PM emissions levels, as well as the corrective actions that were taken to achieve compliance.
5. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 1.44 pounds/hour of PM

Applicable Compliance Method: The above PM emissions limitation was established as specified in the equation below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

Where,

H = 1.44 pounds/hour of PM [hourly controlled potential emissions];
V = 5600 DSCFM [maximum fabric filter system exhaust flow]; and
O = 0.030 grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].

DSCFM = dry standard cubic feet per minute

- c. Emission Limitation: No visible particulate emissions from building ventilation

Applicable Compliance Method: USEPA Method 22, 40 CFR Part 60, Appendix A.

- d. Emission Limitation: 1.20 tons/year of PM, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method: The above PM emissions limitation was established as specified in the equation below:

$Y = HT(1 \text{ ton}/2000 \text{ pounds});$

Where,

Y = 1.20 tons/year of PM [yearly controlled potential emissions];
H = 1.44 pounds/hour of PM [hourly controlled potential emissions]; and
T = 1664 hours/year [federally enforceable operating hours restriction].

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

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Issued: 10/24/2002

Emissions Unit ID: P019

None

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Issued: 10/24/2002

Emissions Unit ID: P019

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.