



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

5/24/2016

Certified Mail

Mr. Steve Austin
 Lear Corporation Hebron Plant
 180 N. High St
 Hebron, OH 43025

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: 0145000501
 Permit Number: P0120655
 Permit Type: Initial Installation
 County: Licking

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, The Newark Advocate. 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 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 and Ohio EPA DAPC, Central District Office
 Permit Review/Development Section 50 West Town Street, 6th Floor
 Ohio EPA, DAPC P.O. Box 1049
 50 West Town Street Suite 700 Columbus, OH 43216-1049
 PO Box 1049
 Columbus, Ohio 43216-1049

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 Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

P002 - Initial installation of a new molded polyurethane foam manufacturing operation to replace an existing molded polyurethane foam manufacturing line. Manufacturing operations will result in air emissions of volatile organic compounds.

3. Facility Emissions and Attainment Status:

The facility produces seat cushions that will be shipped to other Lear facilities for assembly into automobile seating. Facility emissions are less than Title V thresholds, given the synthetic minor restrictions. Licking County is currently in non-attainment with the 2008, 8-hour ozone standard.

4. Source Emissions:

Seat cushions manufactured on P002 will consist of molded (4) component polyurethane foam. The (4) components are a blend of polyol and TDI mixed in controlled proportions to react, expand to fill the mold and cure into the mold. High pressure meter heads (which eliminate the need for solvent cleaning at the mix heads) meter in the blended polyol and TDI. The molds are closed and the (4) components are fully reactive in the process.

Emissions from the foam operation are calculated below using emissions estimates from MDEQ, 2/23/88 memo.

$$\text{VOC/TDI} = (1.3 \text{ lbs/carrier}) * (362 \text{ carriers/hr}) * (2.5 \times 10^{-6} \text{ lb TDI emissions/lb TDI}) = 0.001 \text{ lb/hr}$$
$$(0.001 \text{ lb/hr}) * (6,912 \text{ hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.003 \text{ tpy}$$

Once cured, the closed molds are conveyed to manual work stations to be opened and removed. Cushions are inspected, trimmed and repaired as necessary. Empty molds are prepared for reuse by manual scraping and brushing to remove residual foam. The mold release wax is sprayed applied to clean molds. Naptha and other solvents will be used to disperse the wax and allow for an even and uniform coating. Overspray is controlled by arrestor filters located between the application area and exhaust stack.

Majority of the VOC emissions are emitted during the mold release wax operation. Emissions from the mold release operation are calculated below.

$$\text{VOC} = (0.009 \text{ gal/carrier}) * (6.15 \text{ lb VOC/gal}) * (362 \text{ carriers/hr}) = 20.04 \text{ lb VOC/hr}$$
$$(20.04 \text{ lb VOC/hr}) * (6,912 \text{ hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 69.25 \text{ tpy}$$

$$\text{Toluene} = (0.009 \text{ gal/carrier}) * (0.0013 \text{ lb Toluene/gal}) * (362 \text{ carriers/hr}) = 0.004 \text{ lb/hr}$$
$$(0.004 \text{ lb/hr}) * (6,912 \text{ hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.014 \text{ tpy}$$

Ethyl Benzene = (0.009 gal/carrier) * (0.0002 lb Ethyl Benzene/gal) * (362 carriers/hr) = 0.0007 lb/hr
(0.0007 lb/hr) * (6,912 hrs/yr) * (ton/2000 lbs) = 0.002 tpy

Naphthalene = (0.009 gal/carrier) * (0.00003 lb Naphthalene/gal) * (362 carriers/hr) = 0.0001 lb/hr
(0.0001 lb/hr) * (6,912 hrs/yr) * (ton/2000 lbs) = 0.0003 tpy

Particulate emissions are also accounted for in the overspray from the mold release wax operation. See below for calculations.

PE = (0.009 gal/carrier) * (6.5 lbs/gal) * (0.04% solids) * (362 carriers/hr) * (1-0.90 TE) * (1-0.5 RE) =
0.042 lb/hr
(0.042 lb PE/hr) * (6,912 hrs/yr) = 0.15 tpy

5. Conclusion:

Issuance of FEPTIO P0120655 is recommended.

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>69.2</u>
<u>PE</u>	<u>0.15</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

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

Lear Corporation Hebron Plant

180 North High Street,, Hebron, OH 43025

ID#:P0120655

Date of Action: 5/24/2016

Permit Desc:Initial installation of a new molded polyurethane foam manufacturing operation to replace an existing molded polyurethane foam manufacturing line..

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: Stephanie Habinak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Lear Corporation Hebron Plant**

Facility ID:	0145000501
Permit Number:	P0120655
Permit Type:	Initial Installation
Issued:	5/24/2016
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
Lear Corporation Hebron Plant

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	10
1. P002, Seating Line No. 2	11



Draft Permit-to-Install and Operate

Lear Corporation Hebron Plant

Permit Number: P0120655

Facility ID: 0145000501

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0145000501
Application Number(s): A0055653
Permit Number: P0120655
Permit Description: Initial installation of a new molded polyurethane foam manufacturing operation to replace an existing molded polyurethane foam manufacturing line.
Permit Type: Initial Installation
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/24/2016
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:

Lear Corporation Hebron Plant
180 North High Street
Hebron, OH 43025

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Lear Corporation Hebron Plant

Permit Number: P0120655

Facility ID: 0145000501

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120655

Permit Description: Initial installation of a new molded polyurethane foam manufacturing operation to replace an existing molded polyurethane foam manufacturing line.

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

Emissions Unit ID:	P002
Company Equipment ID:	Seating Line No. 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Lear Corporation Hebron Plant
Permit Number: P0120655
Facility ID: 0145000501
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 Ohio EPA DAPC, Central District Office 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
Lear Corporation Hebron Plant
Permit Number: P0120655
Facility ID: 0145000501
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

Lear Corporation Hebron Plant

Permit Number: P0120655

Facility ID: 0145000501

Effective Date: To be entered upon final issuance

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 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 delegated 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
Lear Corporation Hebron Plant
Permit Number: P0120655
Facility ID: 0145000501
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P002, Seating Line No. 2

Operations, Property and/or Equipment Description:

Molded polyurethane foam manufacturing operation.

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. d)(4)

(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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	The requirements of this rule are equivalent to the emission limitation established by OAC rule 3745-31-05(D). See b)(2)a., d)(1) – (2), e)(2)a. and f)(1) below.
b.	OAC rule 3745-31-05(A)(3), as effective 06/30/08	The permittee shall employ an air spray technology for the mold wax material that achieves at least 90% transfer efficiency. The permittee shall employ fabric arrestor-type filters or impingement baffles that achieve at least 50% control efficiency for the particulate emissions from over-sprayed mold wax material. See b)(2)b. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/08	The Best Available Technology (BAT) requirements under OAC rule 3745-31-



Draft Permit-to-Install and Operate

Lear Corporation Hebron Plant

Permit Number: P0120655

Facility ID: 0145000501

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions are less than 10 tons/year, taking into account the federally enforceable restriction in b)(1)d. below. See b)(2)c. below.
d.	OAC rule 3745-31-05(D) [Synthetic minor to avoid Title V applicability]	Volatile organic compound (VOC) emissions shall not exceed 69.2 tons per rolling, 12- month summation. See b)(2)a., c)(1), d)(1) – (3), e)(2), and f)(1) below.

(2) Additional Terms and Conditions

- a. The emissions of VOC from this emissions unit shall not exceed 69.8 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability 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:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (Tons)</u>
1	5.82
1-2	11.64
1-3	17.46
1-4	23.28
1-5	29.10
1-6	34.92
1-7	40.74
1-8	46.56
1-9	52.38
1-10	58.20



Draft Permit-to-Install and Operate

Lear Corporation Hebron Plant

Permit Number: P0120655

Facility ID: 0145000501

Effective Date: To be entered upon final issuance

1-11	64.02
1-12	69.2

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 VOC emissions.

- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 6,912, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability 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 operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	576
1-2	1,152
1-3	1,728
1-4	2,304
1-5	2,880
1-6	3,456
1-7	4,032
1-8	4,608
1-9	5,184
1-10	5,760



1-11	6,336
1-12	6,912

After the first 12 calendar months of operation or the first 12 calendar months 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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the identification of each mold release, as applied;
 - b. the VOC content of each mold release, in pounds of VOC per gallon;
 - c. the volume, in gallons of each mold release, applied;
 - d. the total VOC emissions for all mold release, applied, in tons per month [the sum of (1)b. x (1)c.] for each mold release divided by 2,000 lbs/ton.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the VOC emission rate for each month of operations; and
 - b. 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 VOC emissions.

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.

- (3) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. 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 operating hours.

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 operating hours for each calendar month.

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

e) Reporting Requirements

(1) 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.

(2) 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 exceedances of the rolling, 12-month emission limitation for VOC 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;

ii. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; 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 hours of operation;

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).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

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:

VOC emissions shall not exceed 69.2 tons per rolling, 12-month period

- Applicable Compliance Method:

Compliance with the emission limitation shall be determined by the monitoring and recordkeeping established by Section d)(2).

g) Miscellaneous Requirements

- (1) None.