



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

9/17/2008

Certified Mail

Joesph Clark
Bridgestone APM Company - Foam Products Division
1800 Industrial Drive
Findlay, OH 45840

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0388010051
Permit Number: 03-17452
Permit Type: OAC Chapter 3745-31 Modification
County: Wyandot

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 EPA Weekly Review and the local newspaper, The Daily Cheif-Union. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 in writing 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, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This Chapter 31 modification PTI is for three glue booths, emissions unit R001-R003, used in the production of polyurethane foam seats located at Bridgestone APM.

3. Facility Emissions and Attainment Status:

Bridgestone APM is considered a "major" facility for Title V purposes. Wyandot County is designated as attainment for all criteria pollutants.

4. Source Emissions:

This permit will place federally enforceable restrictions on the emissions units by way of a combined annual restriction on material usage of 6471 gallons. This restriction will result in a permit allowable emissions of 18.03 tons per rolling 12-month period combined for emissions units R001-R003. Bridgestone APM established a synthetic minor usage restriction in PTI 03-16366, issued September 27, 2005, but has needed to increase the usage restriction.

5. Conclusion:

With federally enforceable restrictions in place for OC emissions, facility-wide emissions will be less than than 250 tons VOC per year making Bridgestone APM a "minor" facility for PSD purposes.

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>
OC	18.03
PE	0.12

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Bridgestone APM Company - Foam Products Division

Issue Date: 9/17/2008

Permit Number: 03-17452

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Chapter 31 modification to increase maximum annual glue usage restriction and synthetic minor emission rate for three glue booths.

Facility ID: 0388010051

Facility Location: Bridgestone APM Company - Foam Products Division
245 Commerce Way,
Upper Sandusky, OH 43351

Facility Description: Polystyrene Foam Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

Air Pollution Permit-to-Install
for
Bridgestone APM Company - Foam Products Division

Facility ID: 0388010051
Permit Number: 03-17452
Permit Type: OAC Chapter 3745-31 Modification
Issued: 9/17/2008
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Bridgestone APM Company - Foam Products Division

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17452

Facility ID: 0388010051

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0388010051
Facility Description: polyurethane foam automotive seat cushion manufacturer
Application Number(s): A0005315
Permit Number: 03-17452
Permit Description: Chapter 31 modification to increase maximum annual glue usage restriction and synthetic minor emission rate for three glue booths.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$300.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/17/2008
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Bridgestone APM Company - Foam Products Division
245 Commerce Way
Upper Sandusky, OH 43351

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 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

Chris Korleski
Director



Authorization (continued)

Permit Number: 03-17452

Permit Description: Chapter 31 modification to increase maximum annual glue usage restriction and synthetic minor emission rate for three glue booths.

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

Group Name: Glue Booths

Emissions Unit ID:	R001
Company Equipment ID:	Glue Booth #1
Superseded Permit Number:	03-16366
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Glue Booth #2
Superseded Permit Number:	03-16366
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Glue Booth #3
Superseded Permit Number:	03-16366
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17452

Facility ID: 0388010051

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, 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 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.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



(2) 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 Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 Ohio EPA DAPC, Northwest District Office 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).

6. Compliance Requirements

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

b) 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.

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



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting 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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. 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



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum,



the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

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

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



16. 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 within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. 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.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17452

Facility ID: 0388010051

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17452

Facility ID: 0388010051

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17452

Facility ID: 0388010051

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Glue Booths: R001, R002, R003,

EU ID	Operations, Property and/or Equipment Description
R001	Manual glue booth no.1
R002	Manual glue booth no.2
R003	Manual glue booth no.3

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

(1) d)(4), d)(5), d)(6), d)(7), and e)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a) for R001 only	9.80 lbs organic compounds (OC)/hour See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a) for R002 only	9.80 lbs organic compounds (OC)/hour See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a) for R003 only	9.80 lbs organic compounds (OC)/hour See b)(2)a.
d.	OAC rule 3745-31-05(D) for all emissions units in this group	18.03 tons per rolling 12-month period See b)(2)b.
e.	OAC rule 3745-17-11(B) for all units in this emissions unit group	0.551 lb particulate emissions/hour [see b)(2)e.]
f.	OAC rule 3745-17-07(A) for all units in this emissions unit group	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule. [see b)(2)f.]
g.	OAC rule 3745-21-07(G)(2) for all units in this emissions unit group	See b)(2)c.
h.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(4) through d)(7)
i.	OAC rule 3745-17-11(C)	See b)(2)d.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).



- b. The OC emissions from emissions units R001, R002 & R003 combined shall not exceed 18.03 tons per rolling 12-month period based on a material usage restriction (see c)(1)) and an OC content restriction (see c)(3)).

The 18.03 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

- c. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the new SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP.

It should be noted that OAC rule 3745-21-07(G)(2) does not establish any requirements for this emissions unit due to the restriction prohibiting the use of photochemically reactive material. The restriction on the use of photochemically reactive material shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(2) and d)(8) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- e. The requirements to comply with this rule and with f)(1)b., f)(1)e., and f)(1)h. of this permit shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- f. The requirements to comply with the visible PE limitation and with f)(1)c., f)(1)f., and f)(1)i. of this permit shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions. [This emissions unit will be exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit will no longer be subject to any mass emission limitation based on OAC rule 3745-17-11.]
- g. The hourly emission limitation of 9.80 lbs OC/hour represents the potential to emit for each emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.



c) Operational Restrictions

- (1) The maximum annual mold release usage from R001, R002 and R003 combined shall not exceed 6,471 gallons, based on a rolling, 12-month summation of material usage.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the material usage, upon issuance of this permit.

- (2) Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices.
- (3) The OC content of the adhesive employed in emissions unit R001, R002 and R003 shall not exceed 5.57 pounds per gallon, as applied.
- (4) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in emissions unit R001, R002 and R003 is prohibited.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the company name and identification of each adhesive applied;
- b. documentation on whether or not each adhesive is a photochemically reactive material;
- c. the number of gallons of each adhesive employed;
- d. the OC content, in pounds per gallon, for each adhesive, as applied;
- e. the OC emission rate for each adhesive employed, in lbs/month [d)(1)c. times d)(1)d. for each adhesive employed]; and
- f. the total monthly OC emission rate for all adhesives employed, in lbs (sum of d)(1)e. for all adhesives).

- (2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emission units R001, R002, and R003 combined:

- a. For the first 12 months of operation, the cumulative monthly emissions rate of OC, in tons per month;
- b. Beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for OC, in tons;
- c. During the first 12 calendar months of operation, the cumulative adhesive usage, in gallons; and



- d. Beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the adhesive usage, in gallons.

The records shall be maintained in accordance with the Standard Terms and Conditions of this permit.

- (3) The permit-to-install (PTI) application for this/these emissions unit(s), R001, R002 and R003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Δ Toxic Air Contaminant Statute $\text{\textcircled{a}}$, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Δ Review of New Sources of Air Toxic Emissions, Option A $\text{\textcircled{a}}$, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., Δ 24 $\text{\textcircled{a}}$ hours per day and Δ 7 $\text{\textcircled{a}}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/24 \times 5/7 = 4 TLV/42 = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case $\text{\textcircled{a}}$ toxic contaminant(s):



Toxic Contaminant: Hexane

TLV (mg/m3): 176.24

Maximum Hourly Emission Rate (lbs/hr): 29.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1480

MAGLC (ug/m3): 4196

The permittee, has demonstrated that emissions of hexane, from emissions unit(s) R001, R002 and R003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F):



- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (7) Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:
- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
 - b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.



- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
- f. Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.
- g. Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. any exceedances of the maximum allowable gallon usage rates specified in c)(1) of this permit;
 - b. any exceedances of the 18.03 tons OC per rolling, 12-month period for R001, R002 & R003 combined;
 - c. any exceedances of the maximum allowable adhesive OC content specified in c)(3).

The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (3) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute[@], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.



f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section C.1.b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

9.80 lbs OC/hour for emissions unit R001

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for each emissions unit and was established by multiplying the maximum hourly coating usage rate (1.76 gallons per hour) by the maximum OC coating content (5.57 pounds of OC per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation:

0.551 lb PE/hour for emissions unit R001

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

c. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule, for emissions unit R001

Applicable Compliance Method:

If required compliance shall be demonstrated in accordance with US EPA Method 9 of 40 CFR Part 60, Appendix A.



d. Emission Limitation:

9.80 lbs OC/hour for emissions unit R002

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for each emissions unit and was established by multiplying the maximum hourly coating usage rate (1.76 gallons per hour) by the maximum OC coating content (5.57 pounds of OC per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

e. Emission Limitation:

0.551 lb PE/hour for emissions unit R002

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

f. Emission Limitation:

Visible PE shall not exceed 0% opacity as a six-minute average for emissions unit R002

Applicable Compliance Method:

If required compliance shall be demonstrated in accordance with US EPA Method 9 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

9.80 lbs OC/hour for emissions unit R003



Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for each emissions unit and was established by multiplying the maximum hourly coating usage rate (1.76 gallons per hour) by the maximum OC coating content (5.57 pounds of OC per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

h. Emission Limitation:

0.551 lb PE/hour for emissions unit R003

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

i. Emission Limitation:

Visible PE shall not exceed 0% opacity as a six-minute average for emissions unit R003

Applicable Compliance Method:

If required compliance shall be demonstrated in accordance with US EPA Method 9 of 40 CFR Part 60, Appendix A.

j. Emission Limitation:

18.03 tons OC per rolling 12-month period for emissions units R001, R002 & R003 combined

Applicable Compliance Method:

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section d)(3) of this permit.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17452

Facility ID: 0388010051

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.