Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

8/6/2010

Certified Mail

| | |
|---|---|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |

Michael Medvik
Invacare Corporation
1200 Taylor Street
Elyria, OH 44035-2125

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0247040179
Permit Number: P0106490
Permit Type:Initial Installation
County: Lorain

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 Chronicle Telegram. 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 "Issued Air Pollution Control Permits" link. 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

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, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Canada

Lorain County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Invacare Corporation

Issue Date: 8/6/2010
Permit Number: P0106490
Permit Type: Initial Installation
Permit Description: This permit is for the installation of two foam process lines.
Facility ID: 0247040179
Facility Location: Invacare Corporation
1200 Taylor Street,
Elyria, OH 44035-2125
Facility Description: Surgical Appliance and Supplies 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 Kristen Switzer at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 43087 or (330)425-9171. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

# Permit Strategy Write-Up

1. Check all that apply:

   _x_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Invacare Corporation is a wheelchair/scooter manufacturing facility located in Elyria, Ohio, in Lorain County.

   This permit is to allow for additional annual VOC and HAP emissions from installation of two foam process lines.

3. Facility Emissions and Attainment Status:

   Invacare Corporation is a potential major source of HAP emissions.

   Lorain County is attainment for ozone.

4. Source Emissions:

   This permit allows for additional annual VOC and HAP emissions from installation of two foam process lines. This permit limits facility-wide HAP emissions to 9.9 tons per year for each single HAP and 24.9 tons per year for total combined HAPs.

5. Conclusion:

   This permit is to allow for additional annual VOC and HAP emissions from foam process lines.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| Pollutant | Tons Per Year |
|---|---|
| VOC/HAP | 1.98 |

Ohio | Environmental Protection Agency

# DRAFT

# Division of Air Pollution Control
# Permit-to-Install
for
Invacare Corporation

| | |
|---|---|
| Facility ID: | 0247040179 |
| Permit Number: | P0106490 |
| Permit Type: | Initial Installation |
| Issued: | 8/6/2010 |
| Effective: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install**
for
Invacare Corporation

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# Authorization

Facility ID: 0247040179
Facility Description: Manufacturer of wheelchairs
Application Number(s): A0038366
Permit Number: P0106490
Permit Description: This permit is for the installation of two foam process lines.
Permit Type: Initial Installation
Permit Fee: $400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/6/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Invacare Corporation
1200 Taylor Street
Elyria, OH 44035-2125

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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: P0106490
Permit Description: This permit is for the installation of two foam process lines.

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

| | |
|---|---|
| **Emissions Unit ID:** | **P009** |
| Company Equipment ID: | Rigid Foam Blocks |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P010** |
| Company Equipment ID: | Cannon I-Skin Foam Machine |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

# 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 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 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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 by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown 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 reporting requirements identified in this permit 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 deviation report, 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 <u>obtained before</u> 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 new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**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.

# B. Facility-Wide Terms and Conditions

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.

# C. Emissions Unit Terms and Conditions

## 1. P009, Rigid Foam Blocks

**Operations, Property and/or Equipment Description:**

Rigid Foam Blocks

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) None.

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), as effective 11/30/01 | VOC emissions shall not exceed 0.23 pound per hour and 0.99 ton per year.<br><br>See b)(2)a, b)(2)f, and b)(2)g below. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | See b)(2)b below. |
| c. | OAC rule 3745-31-05(D)(1)(b) | See b)(2)d, b)(2)e, and b)(2)f below. |
| d. | 40 CFR Part 63, Subpart OOOOOO | See b)(2)c below. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOCs is less than 10 tpy.

c. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart OOOOOO, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Flexible Polyurethane Foam Production and Fabrication. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA.

d. The emissions of each individual HAP from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

e. The emissions of the total combined HAPs from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

f. All HAP emissions from this source are volatile organic compounds (VOCs).

g. Potential emissions of VOCs from this emissions unit are 0.005 pound per hour and 0.02 ton per year according to the permittee's application. The permittee has requested emission limitations of 0.23 pound per hour and 0.99 ton per year to allow for flexibility in the event material usage and/or production changes in the future. Although potential emissions of VOCs (HAPs) from this emissions unit do not exceed ten pounds per day, OAC rule 3745-15-05(C)(4) precludes this source from permit exemption since this source in combination with other sources of HAPs at the facility would result in potential combined HAP emissions in excess of 25 tons per year.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the purpose of determining facility-wide HAP emissions:

a. For all coating booths at the facility:

i. the name and identification number of each coating, adhesive, and cleanup material, as applied;

ii. the volume in gallons of each coating, adhesive, and cleanup material, as applied;

iii. the individual HAP content for each HAP in each coating, adhesive, and cleanup material, as applied, in pounds per gallon;

iv. the total HAP emissions for all coating booths of each individual HAP [summation of (ii x iii) for each HAP for all coatings, adhesives, and cleanup materials]; and

v. the total combined HAP emissions for all coating booths [summation of iv for all HAPs for all coatings, adhesives, and cleanup materials].

b. For all reactants used in the foam process lines at the facility:

i. the name and identification number of each reactant;

ii. the number of molds produced;

iii. the individual HAP content for each HAP in each reactant;

iv. the total HAP emissions of each individual HAP for all reactants determined using the following equation from "MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", 2004, published by the Alliance for the Polyurethanes Industry:

Lc = Vair * (1/359) * (273.15/Tproc) * (VPmdi/760) * Mw * Kmdi

where:

Lc = the emissions from the enclosed process in lb/month;

Vair = the annual volume of displaced air in ft3/month;

Tproc = the process temperature in K;

VPmdi = the vapor pressure of MDI in mm Hg at process temperature;

Mw = 250.26 (the molecular weight of MDI);

Kmdi = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature; and

359 = the molar volume of an ideal gas in ft3/lb-mole @ 0 degrees Celsius and 1-atmosphere;

and

v. the total combined HAP emissions for all reactants [summation of iv for all HAPs for all reactants].

c. For all equipment cleaners used in the foam process lines at the facility:

i. the name and identification number of each equipment cleaner, as applied;

ii. the volume in gallons of each equipment cleaner, as applied;

iii. the individual HAP content for each HAP in each equipment cleaner, as applied, in pounds per gallon;

iv. the total HAP emissions of each individual HAP for all equipment cleaners employed [summation of (ii x iii) for all equipment cleaners]; and

v. the total combined HAP emissions for all equipment cleaners [summation of iv for all HAPs for all equipment cleaners].

d. For all mold release agents used in the foam process lines at the facility:

i. the name and identification number of each mold release agent, as applied;

ii. the volume in gallons of each mold release agent, as applied;

iii. the individual HAP content for each HAP in each mold release agent, as applied, in pounds per gallon;

iv. the total HAP emissions of each individual HAP for all mold release agents employed [summation of (ii x iii) for all equipment cleaners]; and

v. the total combined HAP emissions for all mold release agents [summation of iv for all HAPs for all equipment cleaners].

e. The total combined HAP emissions for all emissions units of each individual HAP and total combined HAPs [summation of d)(1)a.iv, d)(1)b.iv, d)(1)c.iv, and d)(1)d.iv for each individual HAP and d)(1)a.v, d)(1)b.v, d)(1)c.v, and d)(1)d.v for all HAP emissions for total combined HAP emissions for all emissions units].

(2) The permittee shall collect and/or record the following information for the purpose of determining VOC and HAP emissions from this emissions unit:

a. product data sheet(s) for each reactant employed, that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids) of each reactant; and

b. the number of molds produced each day (each mold is assumed to displace 5.122 $ft^3$).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any individual HAP from all emissions units at the facility exceeded 9.9 tons per year, and the actual rolling, 12-month emissions of each such individual HAP for each such month. If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent. The quarterly reports shall be submitted in accordance with the Standard terms and conditions in Section A of this permit.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of total combined HAPs from all emissions units at the facility exceeded 24.9 tons per year, and the actual rolling, 12-month emissions of total combined HAPs for each such month. If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent. The quarterly reports shall be submitted in accordance with the Standard terms and conditions in Section A of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 0.23 pound per hour and 0.99 ton per year.

Applicable Compliance Method:

i. Compliance with the annual VOC emission limitation shall be determined using the following equation from "MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", 2004, published by the Alliance for the Polyurethanes Industry:

Lc = Vair * (1/359) * (273.15/Tproc) * (VPmdi/760) * Mw * Kmdi

where:

Lc = the emissions from the enclosed process in lb/year;

Vair = the annual volume of displaced air in ft3/year;

Tproc = the process temperature in K;

VPmdi = the vapor pressure of MDI in mm Hg at process temperature;

Mw = 250.26 (the molecular weight of MDI);

Kmdi = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature; and

359 = the molar volume of an ideal gas in ft3/lb-mole @ 0 degrees Celsius and 1-atmosphere.

ii. Compliance with the hourly VOC emission limitation can be assumed based on the potential to emit as described in b)(2)g.

b. Emission Limitation:

The emissions of each individual HAP from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the

facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

c. Emission Limitation:

The emissions of the total combined HAPs from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

g) Miscellaneous Requirements

(1) None.

**2. P010, Cannon I-Skin Foam Machine**

**Operations, Property and/or Equipment Description:**

Cannon I-Skin Foam Machine

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) None.

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), as effective 11/30/01 | VOC emissions shall not exceed 0.23 pound per hour and 0.99 ton per year.<br><br>See b)(2)a, b)(2)f, and b)(2)g below. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | See b)(2)b below. |
| c. | OAC rule 3745-31-05(D)(1)(b) | See b)(2)d, b)(2)e, and b)(2)f below. |
| d. | 40 CFR Part 63, Subpart OOOOOO | See b)(2)c below. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOCs is less than 10 tpy.

c. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart OOOOOO, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Flexible Polyurethane Foam Production and Fabrication. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA.

d. The emissions of each individual HAP from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

e. The emissions of the total combined HAPs from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

f. All HAP emissions from this source are volatile organic compounds (VOCs).

g. Potential emissions of VOCs from this emissions unit are 0.001 pound per hour and 0.003 ton per year according to the permittee's application. The permittee has requested emission limitations of 0.23 pound per hour and 0.99 ton per year to allow for flexibility in the event material usage and/or production changes in the future. Although potential emissions of VOCs (HAPs) from this emissions unit do not exceed ten pounds per day, OAC rule 3745-15-05(C)(4) precludes this source from permit exemption since this source in combination with other sources of HAPs at the facility would result in potential combined HAP emissions in excess of 25 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the purpose of determining facility-wide HAP emissions:

a. For all coating booths at the facility:

i. the name and identification number of each coating, adhesive, and cleanup material, as applied;

ii. the volume in gallons of each coating, adhesive, and cleanup material, as applied;

iii. the individual HAP content for each HAP in each coating, adhesive, and cleanup material, as applied, in pounds per gallon;

iv. the total HAP emissions for all coating booths of each individual HAP [summation of (ii x iii) for each HAP for all coatings, adhesives, and cleanup materials]; and

v. the total combined HAP emissions for all coating booths [summation of iv for all HAPs for all coatings, adhesives, and cleanup materials].

b. For all reactants used in the foam process lines at the facility:

i. the name and identification number of each reactant;

ii. the number of molds produced;

iii. the individual HAP content for each HAP in each reactant;

iv. the total HAP emissions of each individual HAP for all reactants determined using the following equation from "MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", 2004, published by the Alliance for the Polyurethanes Industry:

Lc = Vair * (1/359) * (273.15/Tproc) * (VPmdi/760) * Mw * Kmdi

where:

Lc = the emissions from the enclosed process in lb/month;

Vair = the annual volume of displaced air in ft3/month;

Tproc = the process temperature in K;

VPmdi = the vapor pressure of MDI in mm Hg at process temperature;

Mw = 250.26 (the molecular weight of MDI);

Kmdi = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature; and

359 = the molar volume of an ideal gas in ft3/lb-mole @ 0 degrees Celsius and 1-atmosphere;

and

the total combined HAP emissions for all reactants [summation of iv for all HAPs for all reactants].

c. For all equipment cleaners used in the foam process lines at the facility:

i. the name and identification number of each equipment cleaner, as applied;

ii. the volume in gallons of each equipment cleaner, as applied;

iii. the individual HAP content for each HAP in each equipment cleaner, as applied, in pounds per gallon;

iv. the total HAP emissions of each individual HAP for all equipment cleaners employed [summation of (ii x iii) for all equipment cleaners]; and

v. the total combined HAP emissions for all equipment cleaners [summation of iv for all HAPs for all equipment cleaners].

d. For all mold release agents used in the foam process lines at the facility:

i. the name and identification number of each mold release agent, as applied;

ii. the volume in gallons of each mold release agent, as applied;

iii. the individual HAP content for each HAP in each mold release agent, as applied, in pounds per gallon;

iv. the total HAP emissions of each indiviual HAP for all mold release agents employed [summation of (ii x iii) for all equipment cleaners]; and

v. the total combined HAP emissions for all mold release agents [summation of iv for all HAPs for all equipment cleaners].

e. The total combined HAP emissions for all emissions units of each individual HAP and total combined HAPs [summation of d)(1)a.iv, d)(1)b.iv, d)(1)c.iv, and d)(1)d.iv for each individual HAP and d)(1)a.v, d)(1)b.v, d)(1)c.v, and d)(1)d.v for all HAP emissions for total combined HAP emissions for all emissions units].

(2) The permittee shall collect and/or record the following information for the purpose of determining VOC and HAP emissions from this emissions unit:

a. product data sheet(s) for each reactant employed, that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids) of each reactant; and

b. the number of molds produced each day (each mold is assumed to displace 0.074 $ft^3$).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of any individual HAP from all emissions units at the facility exceeded 9.9 tons per year, and the actual rolling, 12-month emissions of each such individual HAP for each such month. If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent. The quarterly reports shall be submitted in accordance with the Standard terms and conditions in Section A of this permit.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month emissions of total combined HAPs from all emissions units at the facility exceeded 24.9 tons per year, and the actual rolling, 12-month emissions of total combined HAPs for each such month. If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent. The quarterly reports shall be submitted in accordance with the Standard terms and conditions in Section A of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 0.23 pound per hour and 0.99 ton per year.

Applicable Compliance Method:

i. Compliance with the annual VOC emission limitation shall be determined using the following equation from "MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry", 2004, published by the Alliance for the Polyurethanes Industry:

Lc = Vair * (1/359) * (273.15/Tproc) * (VPmdi/760) * Mw * Kmdi

where:

Lc = the emissions from the enclosed process in lb/year;

Vair = the annual volume of displaced air in ft3/year;

Tproc = the process temperature in K;

VPmdi = the vapor pressure of MDI in mm Hg at process temperature;

Mw = 250.26 (the molecular weight of MDI);

Kmdi = the adjustment factor to the vapor pressure that is a function of MDI concentration in the feedstock and the temperature; and

359 = the molar volume of an ideal gas in ft3/lb-mole @ 0 degrees Celsius and 1-atmosphere.

ii. Compliance with the hourly VOC emission limitation can be assumed based on the potential to emit as described in b)(2)g.

b. Emission Limitation:

The emissions of each individual HAP from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the

facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

c. Emission Limitation:

The emissions of the total combined HAPs from emissions units R001, R002, R003, R004, P006, P007, P009, and P010, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) of these terms and conditions.

g) Miscellaneous Requirements

(1) None.