

**Synthetic Minor Determination and/or**  **Netting Determination**  
**Permit To Install 02-21664**

**A. Source Description**

The facility makes molded foam plastic parts; Standard Industrial Code. is 2869. The application is for the installation of one additional molding machine (P005). This machine will make expandable polystyrene (EPS) and polyethylene/polystyrene (EPE/EPS) foam products.

**B. Facility Emissions and Attainment Status**

The volatile organic compounds (VOC) emissions are comprised of pentane, which is not a hazardous air pollutant (HAP). The applicant has proposed operating restrictions to limit the VOC content and the resin usage so that the allowable VOC emissions rate will be less than 100 tpy. This Geneva, Ohio facility will be in Ashtabula county, which is currently non-attainment for ozone. The facility-wide potential emissions are more than 250 tpy of VOC emissions, and meet the major source definitions in regards to Title V operating permit applicability and prevention of significant deterioration (PSD) rules.

**C. Source Emissions**

The potential VOC emissions at the facility:

| Maximum, Uncontrolled VOC Emissions                  |                    |
|--|--------------------|
| Emissions Units                                      | VOC emissions, tpy |
| P001 + P002 + P003 + P004, existing EUs              | 1472               |
| 8.369 mmBtu/hr natural gas-fired boiler, existing EU | 0.2                |
| P005, new EU   | 92                 |
| all EU = P001 + P002 + P003 + P004 + P005 + boiler   | 1564.2             |

Note: the 8.369 mmBtu/hr natural gas-fired boiler is exempt from PTI & PTO requirements, but must be considered in the facility-wide analysis potential VOC emissions.

The applicant has proposed maintaining existing operating restrictions, from PTI 02-17794 to limit the VOC (pentane) content to 10% by weight as applied, with a resin usage restriction of 1,980,000 lbs per year of resin, as a rolling 12-month average the pre-expansion/pre-puff storage lines No. 1 and No. 2 (P001 and P002) so that allowable VOC emissions from all emission units, including this new installation (P005) will be less than 100 tpy, over a rolling 12-month period. Additionally, as with the PTI 02-17794, there will be an operating restriction for the existing molding machines (P003 + P004) and the new molding machine (P005) to be permitted to only process pre-puff materials that were generated on-site (i.e., at P001 or P002). The restricted allowable emissions will be:

| Restricted, Allowable VOC Emissions                |                    |
|--|--------------------|
| Emissions Units                                    | VOC emissions, tpy |
| P001 + P002 + P003 + P004 + P005                   | 94.1               |
| 8.369 mmBtu/hr natural gas-fired boiler            | 0.2                |
| all EU = P001 + P002 + P003 + P004 + P005 + boiler | 94.3               |

**D. Conclusion**

This synthetic minor permit has federally enforceable limitations, as well as record keeping and reporting requirements of combined VOC emissions estimates from existing emissions units (P001, P002, P003, and P004) and from the proposed new installation, emission unit (P005), that will ensure that the major source threshold for Title V applicability and PSD applicability are not exceeded.



**ASHTABULA COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-21664 FOR AN AIR CONTAMINANT SOURCE FOR  
Third Dimension, Inc.**

On 2/9/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Third Dimension, Inc.**, located at **633 Pleasant Ave, Geneva, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-21664:

**unimat molding machine.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087  
[(330)425-9171]



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 02-21664**

Application Number: 02-21664  
Facility ID: 0204030449  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Third Dimension, Inc.  
Person to Contact: Louis DeJesus  
Address: PO Box 309  
Geneva, OH 440410309

Location of proposed air contaminant source(s) [emissions unit(s)]:

**633 Pleasant Ave  
Geneva, Ohio**

Description of proposed emissions unit(s):

**unimat molding machine.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Third Dimension, Inc.

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Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0204030449

## **A. Permit to Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Records Retention Requirements**

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.

### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### **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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

#### **6. Permit Transfers**

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

#### **7. 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.

#### **8. Termination of Permit to Install**

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

#### **9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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

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

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

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This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

#### 14. Construction Compliance Certification

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

#### 15. 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 this Permit to Install.

### B. Permit to Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC               | 92                   |

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| <u>Operations, Property,<br/>and/or Equipment</u>  | <u>Applicable Rules/Requirements</u>                    | <u>Applicable Emissions<br/>Limitations/Control Measures</u>   |
|--|---|--|
| P005 - Molding machine No. 5 for expandable polystyrene foam and polystyrene/polyethylene foam products with product aging | OAC rule 3745-31-05(A)(3)<br><br>OAC rule 3745-31-05(C) | Organic compound (OC) emissions shall not exceed 21.0 lbs/hr and 92 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See term A.2.a.<br><br>The combined OC emissions from emissions units P001, P002, P003, P004, and P005 shall not exceed 94.1 tons/year based upon a rolling 12-month summation of the monthly emissions. See term B.1. |

**2. Additional Terms and Conditions**

- 2.a The OC emissions are comprised of pentane, which is also a volatile organic compound (VOC) as defined in OAC rule 3745-21-01(B)(6).

**B. Operational Restrictions**

- 1. Only pre-puff resin that is processed at on-site pre-expansion lines (P001 or P002) may be molded on this molding machine. This will limit the amount of pre-puff resin that is molded in this emission unit to 1,980,000 lbs/yr. The permittee shall demonstrate compliance with this limitation upon the issuance of this permit to install.

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2. The blowing agent (pentane) content of each resin employed shall not exceed 10% by weight.

**Issued: To be entered upon final issuance****C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and company identification of each pre-puff material employed;
  - b. an identification of the on-site expansion line (i. e. P001 or P002) where the pre-puff material was processed;
  - c. an identification of each pre-puff material composition as expandable polystyrene (EPS) or expandable polyethylene/polystyrene (EPE/EPS);
  - d. the net weight of each pre-puff material employed, in pounds per day;
  - e. for each pre-puff material, the initial blowing agent (pentane) content of the original resin material employed, in percent by weight;
  - f. the total daily OC emissions from the use of all pre-puff materials employed, in pounds per day;
  - g. the actual number of hours this emissions unit was in operation, in hours per day; and
  - h. the average, hourly OC emissions rate, i.e., (f)/(g), in pounds per hour (average).
2. The permittee shall collect and record the following information each month:
  - a. the total monthly OC emissions from the use of all pre-puff materials employed at this emissions unit, in tons/month;
  - b. the combined total monthly OC emissions from all operations at P001, P002, P003, P004, and P005, in tons/month;
  - c. during the first 12 calendar months of operation, the combined total cumulative monthly OC emissions from P001, P002, P003, P004, and P005, in tons; and
  - d. beginning after the first 12 calendar months of operation, the combined rolling 12-month summation of total OC emissions from P001, P002, P003, P004, and P005, in tons/year.

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Emissions Unit ID: **P005**

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3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

| Emission Unit(s) ID | Pollutant | Thres-hold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ) | Maximum Emissions lbs/hr | Maximum Emissions g/sec | Estimated 1 Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ ) | Maximum Acceptable Ground Level Concentration (MAGLC), ( $\mu\text{g}/\text{m}^3$ ) |
|---------------------|-----------|---|--------------------------|-------------------------|--|---|
| P005                | pentane   | 1,770,552   | 21.0                     | 1.3608                  | 4,920  | 42,156  |

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
    - a. the permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
    - b. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
    - c. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
    - d. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information for this emissions unit:
  - a. an identification of each day during which the average hourly OC emissions from pre-puff materials usage exceeded 21.0 pounds/hour, and the actual average hourly OC emissions for each such day; and
  - b. an identification of each day during which pre-puff material that was not processed at on-site expansion line (i. e. P001 or P002) was employed at this emissions unit.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all exceedances of the rolling, 12-month OC emissions limitation for the combined operations at P001, P002, P003, P004, and P005, and for the first 12 calendar months of operation all exceedances of the maximum allowable cumulative emission levels,

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PTI A**Emissions Unit ID: **P005****Issued: To be entered upon final issuance**

and the actual rolling 12-month OC emissions levels or the actual cumulative OC emissions, for each such month.

3. The permittee shall submit annual reports which specify the OC emissions from this emissions unit for the previous calendar year, in tons/year. These reports shall be submitted by February 1 of each year.

4. The permittee shall submit annual reports which specify the combined OC emissions from emissions units P001, P002, P003, P004, and P005, for the previous calendar year. These reports shall be submitted by February 1 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) and operating restriction(s) in Sections A. and B. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation: 21.0 lbs OC/hr from this emissions unit.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.1.h. Determination of the daily OC emissions may be based on the following equation:

$$E_{OC} = [\text{summation of } (W_i_{PPFi} \times P_i) \text{ from } i = 1 \text{ to } i = n] \times (EF_{\text{mold}} + EF_{\text{product aging}}).$$

where:

$E_{OC}$  = the daily, OC emissions for all pre-puff materials from the molding operation and the product aging operation, in pounds per day.

$W_i_{PPFi}$  = the net weight of resin "i" employed, in pounds per day

i = an identifier denoting an individual pre-puff material

n = the total number of different prepuff materials employed throughout the day

$P_i$  = the initial blowing agent (pentane) content of the original resin "i" employed.

$EF_{\text{mold\_EPS}}$  = emission factor for OC emissions from the molding

Emissions Unit ID: P005

operation, which is 0.25 lb OC pounds per pound of available pentane content from EPS resin, as noted on page 11 of "Expandable Polystyrene: Storage and Handling Safety Guide", by Nova Chemicals, an EPS resin bead manufacturer.

EF\_mold\_EPS/EPE = emission factor for OC emissions from the molding operation, which is 0.20 lb OC pounds per pound of available pentane content from EPS/EPE resin, as noted in "% of VOCs Lost During Processing Arcel", by Nova Chemicals. "Arcel" is a brand name for EPS/EPE resin manufactured by Nova Chemicals.

EF\_product aging\_EPS = emission factor for OC emissions from the product aging operation, which is 0.10 lb OC pounds per pound of available pentane content from EPS resin, as noted on page 11 of "Expandable Polystyrene: Storage and Handling Safety Guide" by Nova Chemicals.

EF\_product aging\_EPS/EPE = emission factor for OC emissions from the pre-puff aging operation, which is 0.05 lb OC pounds per pound of available pentane content from EPS/EPE resin, as noted in "% of VOCs Lost During Processing Arcel", by Nova Chemicals.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25A, Method 25 or Method 18, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emissions Limitation: 92 TPY OC from this emissions unit.

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates from the resin pre-expansion and pre-puff aging operations, E\_OC, as specified in section E.1.a. of this permit for the calendar year, and shall be divided by 2,000 pounds/ton.

- c. Emission Limitation: 94.1 TPY OC, as a 12-month rolling average, from emissions units P001, P002, P003, P004, and P005.

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.2.

- d. Operating Restriction: Pre-puff material that was not processed at an on-site expansion line (i. e. P001 or P002) may not be employed at this emissions unit

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Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in section C.1.b.

2. Any determination of initial blowing agent (pentane) content (percent by weight) or density of a resin material shall be based on the material as employed at the pre-expansion line (P001 or P002). The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as employed, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

**F. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-31-05(D), the following terms and conditions are federally enforceable: sections A.1, A.2, B.1, C.1, C.2, D.1, D.2, D.3, D.4, E.1, E.2 and F.1. The permittee has requested that such restrictions be imposed in order to limit the potential to emit for volatile organic compounds, as pentane, and therefore avoid major source status for Title V Operating Permit rules applicability as well as Prevention of Significant Deterioration rules applicability.