Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

6/20/2011

RODNEY WILLIAMS
Createc Corporation
1900 INDUSTRIAL DRIVE
FINDLAY, OH 45840

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0332010202
Permit Number: P0107834
Permit Type: Initial Installation
County: Hancock

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0332010202
Facility Name:	Createc Corporation
Facility Description:	
Facility Address:	1900 INDUSTRIAL DRIVE Findlay, OH 45840 Hancock County
Permit #:	P0107834, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Courier on 05/12/2011. The comment period ended on 06/11/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **No public comments were received.**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Createc Corporation

Facility ID:	0332010202
Permit Number:	P0107834
Permit Type:	Initial Installation
Issued:	6/20/2011
Effective:	6/20/2011
Expiration:	6/20/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Createc Corporation

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Authorization

Facility ID: 0332010202
Application Number(s): A0041423
Permit Number: P0107834
Permit Description: Installation of two additional pre-expanders and four new molding machines to allow for increased production. A facility-wide federally enforceable VOC limit will also be established.
Permit Type: Initial Installation
Permit Fee: $3,500.00
Issue Date: 6/20/2011
Effective Date: 6/20/2011
Expiration Date: 6/20/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Createc Corporation
1900 INDUSTRIAL DRIVE
Findlay, OH 45840

of a Permit-to-Install and Operate 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 this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107834
Permit Description: Installation of two additional pre-expanders and four new molding machines to allow for increased production. A facility-wide federally enforceable VOC limit will also be established.

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

Group Name: Pre-Expansion, Molding, Storage

Emissions Unit ID:	**P003**
Company Equipment ID:	Pre-puff Storage
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	Pre-expander
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P802**
Company Equipment ID:	Pre-expander
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P803**
Company Equipment ID:	PX-3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P804**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P805**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P806**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P807**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P808**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P809**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P810**

Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P811**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P812**
Company Equipment ID:	Molder
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P813**
Company Equipment ID:	MP-10
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P814**
Company Equipment ID:	Finished Product Storage
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Pre-Expansion, Molding, Storage: P003, P801, P802, P803, P804, P805, P806, P807, P808, P809, P810, P811, P812, P813, P814,

EU ID	Operations, Property and/or Equipment Description
P003	Pre-Puff Storage
P801	EPS Bead Pre-Expansion (PX-1)
P802	EPS Bead Pre-Expansion (PX-2)
P803	EPS Bead Pre-Expansion (PX-3)
P804	Molder (MP-1)
P805	Molder (MP-2)
P806	Molder (MP-3)
P807	Molder (MP-4)
P808	Molder (MP-5)
P809	Molder (MP-6)
P810	Molder (MP-7)
P811	Molder (MP-8)
P812	Molder (MP-9)
P813	Molder (MP-10)
P814	Finished Product Storage

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d., d)(3), d)(4), d)(5), d)(6), and e)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), c)(2), d)(1), d)(2), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC rule 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	98.00 tons of volatile organic compounds (VOC) per rolling 12-month period from emissions units P003, P801, P802, P803,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P804, P805, P806, P807, P808, P809, P810, P811, P812, P813, and P814 combined (see b)(2)b.)
c.	OAC rule 3745-21-07(G)	None (see b)(2)c.)
d.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(3) – d)(6) and e)(3).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under ORC rule 3704.03(T) have been determined to be compliance with the rolling 12-month VOC emission limitation established under OAC rule 3745-31-05(D).

b. This permit establishes federally enforceable limitations on emissions of VOC for purposes of avoiding Title V permitting requirements.

Annual VOC emissions from emissions units P003, P801, P802, P803, P804, P805, P806, P807, P808, P809, P810, P811, P812, P813, and P814 shall not exceed 98.00 tons per rolling 12-month period.

Rolling VOC emission limitations were initially established in Permit to Install (PTI) #03-10308 issued on 10/01/97. Since rolling VOC emission records exist from this previously issued PTI, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c. OAC rule 3745-21-07(G) is not applicable because this emissions unit does not use liquid organic materials.

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions, monitoring, recordkeeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio SIP. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: none.

c) Operational Restrictions

(1) The VOC content of the polymer beads shall not exceed the following limits:

a. EPS beads – 6.5%, in weight percent ~~(as received)~~ (monthly weighted average)

b. ARCEL beads – 13%, in weight percent ~~(as received)~~ (monthly weighted average)

(2) The maximum rolling 12-month bead throughput for these emissions units is limited by the following equation:

$$\sum_{M=1}^{12} = \sum_{n} [(U_n)(C_n/100)(0.97)(1 \text{ ton}/2000 \text{ lbs})] \leq 98.00$$

Where

M = the increment of the rolling 12-month period;
n = individual batches of beads ~~lots~~ processed during the period;
U_n = total throughput of the individual bead batch ~~in lot~~ n, in pounds;
C_n = lot-specific VOC content in weight percent for each individual batch ~~lot~~ n;
0.97 = 97% emission rate of VOC contained in the beads (3% of the VOC is retained in the foam)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information each month:

a. the company identification of each ~~lot~~ batch of polymer bead processed;

b. the lot-specific VOC content, in weight percent, for each ~~lot~~ batch of polymer bead processed;

c. the quantity, in ~~tons~~ pounds, of each ~~lot~~ batch of polymer bead processed;

d. the calculated VOC emissions from each ~~lot~~ batch of polymer bead processed, in ~~tons~~ pounds, using the following equation:

$$E_n = \sum_{n} [(U_n)(C_n/100)(0.97)\cancel{(1 \text{ ton}/2000 \text{ lbs})}]$$

Where

E_n = VOC emissions from individual bead ~~lots~~ batches processed;
n = individual bead ~~lots~~ batches processed during the period;
U_n = total throughput of the individual bead batch ~~in lot~~ n, in pounds;
C_n = lot-specific VOC content in weight percent for each individual ~~lot~~ batch n;
0.97 = 97% emission rate of VOC contained in the beads (3% of the VOC is retained in the foam)

e. The total VOC emission rate of all beads processed, in ~~tons~~ pounds per month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + \ldots + E_n$

Where

E_M = monthly VOC emissions, in ~~tons~~ pounds per month; and

E_n = VOC emissions from individual bead ~~lots~~ batches processed [d)(1)d.]

f. The rolling 12-month VOC emission rate calculated as follows:

$E_T = (E_{M1} + E_{M2} + E_{M3} + \ldots + E_{M12}) \times (1 \text{ ton}/2000 \text{ pounds})$

Where

E_T = annual VOC emissions (tons) as summed from the previous 12 months of monthly VOC emissions

E_M = monthly VOC emissions (~~tons~~pounds/month)

(2) The permittee shall require the bead supplier to submit a VOC content analysis (in weight percent) for each lot of polymer beads received and shall maintain records of such analysis.

(3) The emissions units contained in this PTI were evaluated based on the actual materials and design parameters of the emissions units' exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the application. Modeling was performed for each toxic air contaminant emitted at over one ton per year using the SCREEN3 air dispersion model. The predicted 1-hour maximum ground level concentration results from the air dispersion model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:

a. The exposure limit, expressed as a time-weighted average concentration for an 8-hour work day and a 40 hour work week, for each toxic compound emitted from the emissions unit, 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 Government Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the ACGIH's "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; 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 then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week from that of 8 hours per day and 5 days per week. The resulting calculation is used to determined the MAGLC:

TLV/10 x 8/X x 5/Y = 4 TLV/(24)(7) = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or worst case toxic contaminants:

Toxic contaminant: Styrene
TLV: 85.20 mg/m3
Maximum Hourly Emission Rate: 1.60 lbs/hour
Predicted 1-Hour Maximum Ground Level Concentration: 270.00 ug/m3
MAGLC: 2028.57 ug/m3

Toxic contaminant: Ethyl Benzene
TLV: 434.19 mg/m3
Maximum Hourly Emission Rate: 8.00 lbs/hour
Predicted 1-Hour Maximum Ground Level Concentration: 1360.90 ug/m3
MAGLC: 10,337.86 ug/m3

The permittee has demonstrated that ~~MIBK~~ styrene and ethyl benzene emissions are calculated to be less than 80% of the MAGLC; and new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute.

(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 Toxic 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 Toxic Air Contaminant Statute has been documented. If the change(s) meet(s) the definition of a modification, the permittee shall apply for and obtain a final PTI 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 Toxic Air Contaminant Statute:

a. a description of the parameters/values used in each compliance demonstration and the parameters/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 MAGLC for each significant toxic air contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute;

c. a copy of the computer model run(s) that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit to be in compliance with the Toxic Air Contaminant Statute 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 Toxic Air Contaminant Statute and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value in the dispersion model used to demonstrate compliance with the Toxic Air Contaminant Statute through the predicted 1-hour maximum ground level concentration. The record shall include the date and reasons for the change and if the change would increase the ground level concentration.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(2) The permittee shall submit quarterly deviation reports that identify:

a. all deviations of the following emission limitations and operational restrictions that limit the potential to emit of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:

i. 98.00 tons of VOC per rolling 12-month period limitation (for emissions units P003, P801, P802, P803, P804, P805, P806, P807, P808, P809, P810, P811, P812, P813, and P814 combined); and

ii. the VOC content of the polymer beads shall not exceed the following limits:

(a) EPS beads - 6.5%, in weight percent (monthly weighted average)

(b) ARCEL beads - 13%, in weight percent (monthly weighted average)

If no deviations occurred during a calendar quarter, the permittee shall submit a report stating that no deviations occurred during the quarter.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September).

(3) The permitee shall include any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the Toxic Air Contaminant Statute through the predicted 1-hour MAGLC in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>
98.00 tons of volatile organic compounds (VOC) per rolling 12-month period from emissions units P003, P801, P802, P803, P804, P805, P806, P807, P808, P809, P810, P811, P812, P813, and P814 combined

<u>Applicable Compliance Method</u>
The permittee shall demonstrate compliance with the rolling 12-month limitation through the recordkeeping requirements in section d)(1).

g) Miscellaneous Requirements

(1) None