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

2/29/2012

Certified Mail

Facility ID: 0388010051
Permit Number: P0106791
County: Wyandot

Mr. Randall Brown
Bridgestone APM Company - Foam Products Division
245 Commerce Way
Upper Sandusky, OH 43351

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 1/23/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

# Response to Comments

| | |
|---|---|
| Facility ID: | 0388010051 |
| Facility Name: | Bridgestone APM Company - Foam Products Division |
| Facility Description: | polyurethane foam automotive seat cushion manufacturer |
| Facility Address: | 245 Commerce Way<br>Upper Sandusky, OH 43351<br>Wyandot County |
| Permit: | P0106791, Title V Permit - Renewal |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Daily Cheif-Union on 01/25/2012. The comment period ended on 02/24/2012. | |
| 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: None**

a. Comment: None

b. Response: None

Ohio | Environmental Protection Agency

# PRELIMINARY PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
Bridgestone APM Company - Foam Products Division

| | |
|---|---|
| Facility ID: | 0388010051 |
| Permit Number: | P0106791 |
| Permit Type: | Renewal |
| Issued: | 2/29/2012 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Bridgestone APM Company - Foam Products Division

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# Authorization

Facility ID: 0388010051
Facility Description: Polyurethane foam automotive seat cushion manufacturer
Application Number(s): A0039673, A0043547
Permit Number: P0106791
Permit Description: Renewal Title V operating permit for a polyurethane foam automotive seat cushion manufacturer.
Permit Type: Renewal
Issue Date: 2/29/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087991

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# 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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or

local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed

adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## 11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## 12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## 13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. 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, 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. 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).

**28. 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.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# 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.

2. The following non-insignificant emissions units contained in this permit are subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart III, National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Production:

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P005 | Seat Line #2 |
| P006 | Seat Line #1 |

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart III. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart III. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart III and Subpart A.

All the requirements of 40 CFR Part 63, Subpart III, have been established in the Title V permit for this facility, which will encompass these emissions units upon reissuance. The applicable sections of 40 CFR Part 63, Subpart III, have been cited in the appropriate sections for the non-insignificant emissions units (P005 and P006) subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA, Northwest District Office.

[Authority for term: 40 CFR Part 63, Subpart III]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install; or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21; and/or in 40 CFR Part 63, Subpart III:

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| T001 | TDI Storage Tank (10,000 gallons) |
| T002 | MDI Storage Tank (10,000 gallons) |
| T003 | Polyether Polyol Storage Tank (10,000 gallons) |
| T004 | Copolymer Polyol Storage Tank (10,000 gallons) |

[Authority for term: OAC rule 3745-77-07(A)(13)]

# C. Emissions Unit Terms and Conditions

## 1. Emissions Unit Group - Group A: P005 (Seat Line #2), and P006 (Seat Line #1)

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

Polyurethane foam seat line nos.2 and 1

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) b)(1)d., d)(4) through d)(7)., and e)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | ORC 3704.03(T) | The requirements of this rule are equivalent to compliance with the requirements 40 CFR Part 63, Subpart III. |
| b. | OAC rule 3745-31-05(D) (PTI # P0108669, issued 12/20/2011) | 240 tons VOC per rolling, 12-month period from emissions units P005, P006, P007, P008, P801, R001, and R002, combined.<br><br>See b)(2)a. and c)(1). |
| c. | OAC rule 3745-17-11(C) | See c)(2) and c)(3). |
| d. | OAC rule 3745-114-01 | See d)(4) through d)(7). |
| e. | 40 CFR Part 63, Subpart III (See 40 CFR Part 63.1290 et seq.)<br><br>[In accordance with 40 CFR 63.1290, this emissions unit is a flexible polyurethane foam process at an existing flexible polyurethane foam production facility.] | Formulation prohibitions, work practice standards for hazardous air pollutants (HAPS) [See c)(5).] |
| f. | 40 CFR 63.1-15 (40 CFR 63.1302) | Table 2 to Subpart III of 40 CFR Part 63-Applicability to Subpart III shows which parts of the General Provisions in 40 CFR 63.1-15 apply. |

(2) Additional Terms and Conditions

a. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002 shall not exceed 240 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI #P0108669, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum allowable cumulative emissions of VOC (tons) |
|---|---|
| 1 | 20 |
| 1-2 | 40 |
| 1-3 | 60 |
| 1-4 | 80 |
| 1-5 | 100 |
| 1-6 | 120 |
| 1-7 | 140 |
| 1-8 | 160 |
| 1-9 | 180 |
| 1-10 | 200 |
| 1-11 | 220 |
| 1-12 | 240 |

After the first 12 calendar months of operation following the issuance of PTI #P0108669,compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever these emissions unitsare in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart III, including the following sections:

63.1300(a)- HAP or HAP-based material shall not be used as equipment cleaner to flush mixhead, with exception of diisocyanates during periods of startup or maintenance, provided they are contained in closed-loop system and re-used in production.

63.1300(b)- HAP-based mold release agent is prohibited.

[Authority for term: OAC rule 3745-77-07(A)(1); 40 CFR Part 63, Subpart III; and PTI #P0108669]

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each mold release material employed;

b. The number of gallons of each mold release material employed;

c. The VOC content, in lbs/gallon, for each mold release material, as applied;

d. The VOC emission rate for each mold release material employed, in lbs/month [d)(1)b. x d)(1)c. for each mold release material employed]; and

e. The total monthly VOC emission rate for all mold release material employed, (summation of d)(1)d. for all materials, divided by 2000), in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emissions units P005, P006, P007, P008, P801, R001, and R002, combined:

a. for the first 12 calendar months of operation following the issuance of PTI #P0108669, the cumulative monthly VOC emissions, in tons per month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI #P0108669, the rolling, 12-month summation of the monthly VOC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart III, including the following sections:

63.1308(e)(1) – documentation of each calendar day that a HAP-based material is used as an equipment cleaner (except for diisocyanates during periods of startup or maintenance, provided they are contained in closed-loop system and re-used in production).

63.1308(e)(2) – documentation of each calendar day when a HAP-based material is used as a mold release agent.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart III; and PTI #P0108669]

(4) The permit-to-install application for emissions units P005 and P006 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour work day and a 40-hour work week, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "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 "American Conference of Governmental Industrial Hygienists" (ACGIH) "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/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene diisocyanate

TLV (mg/m3): 0.036

Maximum Hourly Emission Rate (lbs/hr): 0.00549, for P005 and P006, individually*

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 0.1242 for P005 and P006, individually;

MAGLC (ug/m3): 0.857

The permittee, has demonstrated that emissions of toluene diisocyanate, from emissions units P005 and P006, combined, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(5) 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", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

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

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(8) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(9) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(10) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(12) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions units were in operation or not operated in accordance with its established procedures. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months of operation following the issuance of PTI #P0108669, all exceedances of the maximum allowable cumulative emission levels; and

b. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) The permittee shall submit annual compliance certifications and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart III, per the following sections:

63.1306(g)- annual compliance report.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR Part 63, Subpart III; and PTI #P0108669]

(3) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the Toxic Air Contaminate Statute, ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4) and OAC rule 3745-114-01]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

240 tons VOC per rolling, 12-month period from emissions units P005, P006, P007, P008, P801, R001, and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in terms d)(1) and d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

g) Miscellaneous Requirements

(1) None.

## 2. Emissions Unit Group - Group B: P007 (EA Pad Line #2), and P008 (EA Pad Line #3)

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

EA pad line nos.2 and 3 - mold release operations

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

(1) d)(4) and d)(5).

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. | OAC rule 3745-31-05(A)(3)<br>(for emissions unit P007 only) | 5.97 lbs organic compounds (OC)/hour<br><br>0.04 lb particulate emissions (PE)/hour, 0.18 ton PE/year<br><br>See b)(2)e. |
| b. | OAC rule 3745-31-05(A)(3)<br>(for emissions unit P008 only) | 7.63 lbs OC/hour<br><br>0.05 lb PE/hour, 0.22 ton PE/year<br><br>See b)(2)e. |
| c. | OAC rule 3745-31-05(A)(3)<br>(for all emissions units in this emissions unit group) | Visible PE shall not exceed 0% opacity as a six-minute average.<br><br>See b)(2)a. and b)(2)b. |
| d. | OAC rule 3745-31-05(D)<br>(PTI # P0108669, issued 12/20/2011) | 240 tons of VOC per rolling 12-month period, from emissions units P005, P006, P007, P008, P801, R001, and R002, combined<br><br>See b)(2)c. and c)(1). |
| e. | OAC rule 3745-17-11(C)<br>(for all emissions units in this emissions unit group) | See b)(2)d. |

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of panel filters for PE control.

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

c. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

d. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan regulating particulate emissions from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3) the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-16345, issued May 7, 2009.

e. All organic compounds are volatile organic compounds.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per year, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months following the issuance of PTI #P0108669, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum allowable cumulative emissions of VOC (tons) |
|---|---|
| 1 | 20 |
| 1-2 | 40 |
| 1-3 | 60 |
| 1-4 | 80 |
| 1-5 | 100 |
| 1-6 | 120 |
| 1-7 | 140 |
| 1-8 | 160 |
| 1-9 | 180 |
| 1-10 | 200 |
| 1-11 | 220 |
| 1-12 | 240 |

After the first 12 calendar months of operation following the issuance of PTI #P0108669, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(2) The permittee shall operate the panel filters whenever P007 and P008 are in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the panel filters were not in service when the emissions units were in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

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

a. the company name and identification of each mold release agent applied;

b. the number of gallons of each mold release agent employed;

c. the VOC content, pounds per gallon, for each mold release agent, as applied;

d. the VOC emission rate for each mold release agent employed, in lbs/month [d)(2)b. x d)(2)c. for each mold release agent employed]; and

e. the total monthly VOC emission rate for all mold release agents employed, in lbs [sum of d)(2)d. for all mold release agents].

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(3) In conjunction with the record keeping requirements specified in d)(2) above, the permittee shall also record the following each month for emissions units P005, P006, P007, P008, P801, R001, and R002, combined:

a. for the first 12 calendar months of operation following the issuance of PTI #P0108669, the cumulative monthly VOC emissions, in tons per month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI #P0108669, the rolling, 12-month summation of the monthly VOC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(4) The application for permit to install (PTI) #03-16345 (issued 05-07-09) for emission units P007 and P008 was evaluated based on the actual materials (mold release agent) and the design parameters of each 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 these emission units 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):

Pollutant: aliphatic naphtha
TLV (mg/m$^3$): 572.6
Maximum Hourly Emission Rate (lbs/hr): 13.60
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m$^3$): 280.7
MAGLC (ug/m$^3$): 13,633

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 (mold release agent), 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 compositions 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.).

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(5) The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the panel filters were not in service when emissions units P007 and P008 were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months following the issuance of PTI #P0108669, all exceedances of the maximum allowable cumulative emission levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(3) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

5.97 lbs OC/hr (for emissions unit P007)

<u>Applicable Compliance Method:</u>

The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

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

*The potential to emit is based on a maximum gallon usage of 1.08 gal/hr and a maximum VOC content of 5.53 lbs/gal.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

b. Emission Limitation:

0.04 lb PE/hour (for emissions unit P007)

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

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

Where

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

c. Emission Limitation:

0.18 ton of PE/year for (emissions unit P007)

Applicable Compliance Method:
The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

d. Emission Limitation:

7.63 lbs OC/hr (for emissions unit P008)

Applicable Compliance Method:
The hourly OC emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

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

*The potential to emit is based on a maximum gallon usage of 1.38 gal/hr and a maximum VOC content of 5.53 lbs/gal.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

e. Emission Limitation:

0.05 lb PE/hour (for emissions unit P008)

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

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

Where

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

f. Emission Limitation:

0.22 ton of PE/year for emissions unit P008

Applicable Compliance Method:
The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

g. Emission Limitation:

240 tons VOC per rolling 12-month period for emissions units P005, P006, P007, P008, P801, R001, and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in terms d)(2) and d)(3) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

h. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

g) Miscellaneous Requirements

(1) None.

## 3. P801, Facility-wide paste wax usage

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

Facility-wide paste wax usage

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 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. | OAC rule 3745-31-05(A)(3), as effective 11/31/01 | 1100 pound VOC per month. |
| b. | OAC rule 3745-31-05(A)(3), as effective 12/01/06 | See b)(2)b. |
| c. | OAC rule 3745-31-05(D) (PTI # P0108669, issued 12/20/2011) | 240 tons of VOC per rolling, 12-month period, from emissions units P005, P006, P007, P008, P801, R001, and R002, combined<br><br>See b)(2)b. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of volatile organic compounds (VOC) since the uncontrolled potential to emit for VOC are less than 10 tons per year.

The potential to emit for this emissions unit is 6.60 tons VOC/year and were determined as follows:

VOC Emissions: potential emissions were determined by multiplying a worst-case VOC content of 6.67 lbs OC/gallon by a known weight of 6.60 gallons/bucket and a maximum annual usage of 300 buckets/year, divided by a conversion factor of 2000 lbs/ton.

c. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

d. The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI #P0108669, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum allowable cumulative emissions of VOC (tons) |
|---|---|
| 1 | 20 |
| 1-2 | 40 |
| 1-3 | 60 |
| 1-4 | 80 |
| 1-5 | 100 |
| 1-6 | 120 |
| 1-7 | 140 |
| 1-8 | 160 |
| 1-9 | 180 |
| 1-10 | 200 |
| 1-11 | 220 |
| 1-12 | 240 |

After the first 12 calendar months of operation following the issuance of PTI #P0108669, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

d) Monitoring and/or Recordkeeping Requirements

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

a. The company name and identification all paste wax used;

b. The number of gallons of each paste wax material employed;

c. The VOC content, pounds per gallon, for each paste wax material, as applied;

d. The VOC emission rate for each paste wax material, in lbs/month [d)(1)b. x d)(1)c. for paste wax employed]; and

e. The total monthly VOC emission rate for all paste wax employed, in lbs [sum of d)(1)d. for all mold release agents].

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emissions units P005, P006, P007, P008, P801, R001, and R002, combined:

a. For the first 12 calendar months of operation following the issuance of PTI #P0108669, the cumulative monthly VOC emissions, in tons per month; and

b. Beginning after the first 12 calendar months of operation following the issuance of PTI #P0108669, the rolling, 12-month summation of the monthly VOC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months of operation following the issuance of PTI #P0108669, all exceedances of the maximum allowable cumulative emission levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1100 pounds VOC per month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in term d)(1) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

b. Emission Limitation:

240 tons VOC per rolling, 12-month period for emissions units P005, P006, P007, P008, P801, R001, and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in terms d)(1) and d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

g) Miscellaneous Requirements

(1) None.

## 4. Emissions Unit Group – Group C: R001 (Glue Booth #1), and R002 (Glue Booth #2)

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

Manual glue booth nos.1 and 2

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) b)(1)d., d)(3) through d)(6)., and e)(1)d.

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. | OAC rule 3745-31-05(A)(3)(a) (for emissions unit R001 only) | 9.80 lbs organic compounds (OC)/hour<br><br>See b)(2)a., b)(2)c., b)(2)d. and c)(4). |
| b. | OAC rule 3745-31-05(A)(3)(a) (for emissions unit R002 only) | 9.80 lbs organic compounds (OC)/hour<br><br>See b)(2)a., b)(2)c., b)(2)d. and c)(4). |
| c. | OAC rule 3745-31-05(D)<br>(PTI # P0108669, issued 12/20/2011) | 240 tons VOC per rolling 12-month period from emissions units P005, P006, P007, P008, P801, R001, and R002, combined<br><br>See b)(2)b. and c)(1). |
| d. | ORC 3704.03(F)<br>OAC rule 3745-114-01 | See d)(3) through d)(6). |
| e. | OAC rule 3745-17-11(C) | See c)(2) and c)(3). |

(2) Additional Terms and Conditions

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

b. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c. The hourly emission limitation of 9.80 lbs OC/hour represents the potential to emit for each emissions unit and was established by multiplying the maximum hourly coating usage rate (1.76 gallons per hour) by the maximum OC coating content (5.57 pounds of OC per gallon). Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

d. All organic compounds are volatile organic compounds.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002 shall not exceed 240 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI #P0108669, the permittee shall not exceed the levels specified in the following table:

| Month(s) | Maximum allowable cumulative emissions of VOC (tons) |
|---|---|
| 1 | 20 |
| 1-2 | 40 |
| 1-3 | 60 |
| 1-4 | 80 |
| 1-5 | 100 |
| 1-6 | 120 |
| 1-7 | 140 |
| 1-8 | 160 |
| 1-9 | 180 |
| 1-10 | 200 |
| 1-11 | 220 |
| 1-12 | 240 |

After the first 12 calendar months of operation following the issuance of PTI #P0108669, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

(4) The OC content of the adhesive employed in emissions unit R001 and R002 shall not exceed 5.57 pounds per gallon, as applied.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0108669]

d) Monitoring and/or Recordkeeping Requirements

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

a. the company name and identification of each adhesive applied;

b. the number of gallons of each adhesive employed;

c. the OC and VOC content, in pounds per gallon, for each adhesive, as applied;

d. the VOC emission rate for each adhesive employed, in lbs/month [d)(1)b. times d)(1)c. for each adhesive employed]; and

e. the total monthly VOC emission rate for all adhesives employed, in lbs [sum of d)(1)d. for all adhesives].

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emission units P005, P006, P007, P008, P801, R001, and R002, combined:

a. for the first 12 calendar months of operation following the issuance of PTI #P0108669, the cumulative monthly emissions rate of VOC, in tons per month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI #P0108669, the rolling, 12-month summation of the VOC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(3) The application for permit-to-install (PTI) #03-17452 (issued 12-31-08), for emissions units R001 and R002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion

model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "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 "American Conference of Governmental Industrial Hygienists" (ACGIH) "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/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/24 x 5/7 = 4 TLV/42 = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

   Toxic Contaminant: Hexane

   TLV (mg/m3): 176.24

   Maximum Hourly Emission Rate (lbs/hr): 29.40

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

   MAGLC (ug/m3): 4196

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(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", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(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", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F),

initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the ”Toxic Air Contaminant Statute“, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(7) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(8) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(9) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(11) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions units were in operation or not operated in accordance with its established procedures. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months of operation following the issuance of PTI #P0108669, all exceedances of the maximum allowable cumulative emission levels;

b. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation;

c. any exceedances of the maximum allowable adhesive OC content specified in c)(4); and

d. 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”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

(2) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.80 lbs OC/hour for emissions units R001 and R002, individually

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

b. Emission Limitation:

240 tons VOC per rolling, 12-month period for emissions units P005, P006, P007, P008, P801, R001, and R002 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in terms d)(1) and d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0108669]

g) Miscellaneous Requirements

(1) None.