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

Certified Mail

10/3/2012

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

Mr. David Podolka
Renosol Seating
180 North High Street
Hebron, OH 43025

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0145000501
Permit Number: P0109894
Permit Type: OAC Chapter 3745-31 Modification
County: Licking

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Newark Advocate. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description: On April 4, 2011, Renosol Seating submitted an application for a chapter 31 modification of PTI P0103719 which covers P001, a foam seating production line (Seating Line No. 1). The facility has requested the following modifications:

   a. an increase in the hourly volatile organic compound (VOC) emission rate from 18.64 pounds per hour (lbs/hr) to 30 lbs/hr;
   b. an increase in the annual volatile organic compound (VOC) emissions limit from 55.6 tons per year (tpy) to 79.5 tpy; and
   c. an increase in the annual operating hours from 5,980 to 7,200 hours per year (hrs/yr).

   With the increase in the maximum hourly emission rate, 30 lbs/hr at 8,760 hours per year results in potential VOC emissions of 131.4 tons per year. The facility has requested federally enforceable limitations on annual VOC emissions (79.5 tpy) and hours of operation (7,200 hrs/yr) based on an average VOC emissions rate of 22 lbs/hr (see calculations below) to avoid the applicability of Title V.

   This application supercedes the application submitted on October 18, 2010.

3. Facility Emissions and Attainment Status: The facility is taking a synthetic minor limitation to avoid Title V. Licking County is nonattainment for ozone and PM 2.5, and in attainment for all other criteria pollutants.

4. Source Emissions:

   P001

   The only regulated pollutants associated with the source are VOC and HAP. Calculations are as follows:

   Materials Usage Rates:

   TDI = 423 lbs/hr
   Polyol = 1226 lbs/hr
   Mold Release = 31.25 lbs/hr*

   Maximum VOC Emission Rate:

   -VOC emission factor from TDI (Based on 2/23/83 Michigan Department of Natural Resources Memo concerning MDI and TDI Emissions from Polyurethane Foaming Processes) = 0.0000025
   -VOC content of Polyol = 0.0001% VOC by weight
   -VOC content of Mold Release = 96% VOC by weight
   **(maximum emission rate of mold release is 30 lbs/hr; average emission rate on production line of mold release is 22 lbs/hr…see synthetic minor calculation below)*

   - VOC from TDI = 423 lbs/hr * 0.0000025 (TDI emission factor based on MDNR Memo) = 0.001 lbs VOC/hr

   - VOC from Polyol = 0.01 lb VOC/lb component (2.9 lbs of VOC containing components in Polyol)
     = 2.9 lb/hr x 0.01 = 0.029 lb VOC/hr

   - VOC from Mold Release = 31.3 lbs/hr * 0.96 = 30.05 lbs VOC/hr

Total Hourly VOC Emission Rate = 0.001 lbs VOC/hr +0.029 lbs VOC/hr + 30.05 lbs VOC/hr = **30.08 lbs VOC/hr**

Maximum Annual VOC Emissions = 30.08 lbs VOC/hr * 8760 hrs/yr * 2000 lbs/ton = **131.8 tons VOC/yr**

Synthetic Minor Limit

- VOC from TDI = 423 lbs/hr * 0.0000025 (TDI emission factor based on MDNR Memo) = 0.001 lbs VOC/hr
- VOC from Polyol = 0.01 lb VOC/lb component (2.9 lbs of VOC containing components in Polyol)
  = 2.9 lb/hr x 0.01 = 0.029 lb VOC/hr
- VOC from Mold Release = 23 lbs/hr * 0.96 = 22.08 lbs VOC/hr

Total Average Hourly VOC Emission Rate = 0.001 lbs VOC/hr +0.029 lbs VOC/hr + 22.08 lbs VOC/hr = 22.11 lbs VOC/hr ~ **22 lbs VOC/hr**[1]

Permitted Allowable Annual VOC Emissions = 22 lbs VOC/hr * 7200 hrs/yr * 2000 lbs/ton = 79.2 tons VOC/yr<**79.5 tons VOC/yr**[2]

[1] Rounded down in application (see modeling table)
[2] Requested Synthetic Minor Limitation based on requested hourly operational limit of 7200 hrs/yr

5. Other:

HAP/Air Toxic Emissions

TDI is an Air Toxic and is the only HAP emitted from P001
Mold Release (Stoddard Solvent) is the only Air Toxic emitted at a rate greater than 1 ton/yr
TWA for Stoddard Solvent = 100ppm (572.6 mg/m^3)
Avg Molecular Weight of Stoddard Solvent = 140
Maximum Screen 3 Calculated Stoddard Solvent Concentration = 2.1 ug/m^3

MAGLC = 4 * (572.6 ug/m^3 / (24 * 7)) = 13.6 ug/m^3
Maximum AERMOD Calculated Stoddard Solvent Concentration = 0.15% of the MAGLC

6. Conclusion: Issuance of FEPTIO P0109894 is recommended.

PUBLIC NOTICE
10/3/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Renosol Seating
180 North High Street,
Hebron, OH 43025
Licking County
FACILITY DESC.: Urethane and Other Foam Product (except Polystyrene) Manufacturing
PERMIT #: P0109894
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: A chapter 31 modification to increase the hours of operation and emissions for the foam seating production line. This modification results in an FEPTIO with a synthetic minor limitation on VOC emissions to avoid Title V.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Adam Novak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Renosol Seating

Facility ID:	0145000501
Permit Number:	P0109894
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/3/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Renosol Seating

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Authorization

Facility ID:	0145000501
Application Number(s):	A0042986, A0044312
Permit Number:	P0109894
Permit Description:	A chapter 31 modification to increase the hours of operation and emissions for the foam seating production line. This modification results in an FEPTIO with a synthetic minor limitation on VOC emissions to avoid Title V.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/3/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Renosol Seating
180 North High Street
Hebron, OH 43025

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109894
Permit Description: A chapter 31 modification to increase the hours of operation and emissions for the foam seating production line. This modification results in an FEPTIO with a synthetic minor limitation on VOC emissions to avoid Title V.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Seat Line No. 1
Superseded Permit Number:	P0103719
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, Seat Line No. 1

Operations, Property and/or Equipment Description:

Foam Seating Production Line

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

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

a. b)(1)c., d)(4) through d)(7), and e)(3).

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

a. b)(1)b., c)(1), d)(2), d)(3), and e)(1).

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)	Volatile organic compound (VOC) emissions shall not exceed 30 pounds per hour (lbs/hr).
b.	OAC Rule 3745-31-05(D)	VOC emissions shall not exceed 79.5 tons per rolling 12-month period. See c)(1) below.
c.	OAC Rule 3745-114	See d)(4) through d)(7) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 7,200 based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for P001:

a. the name and identification number of each molding material, mold release material, and cleanup material, as applied;

b. the number of gallons of each molding material employed;

c. the number of gallons of each mold release material employed;

d. the number of gallons of each cleanup material employed;

e. the VOC content of each molding material, in pounds of VOC per gallon of molding material, excluding water and exempt solvents;

f. the VOC content of each mold release material, in pounds of VOC per gallon of molding material, excluding water and exempt solvents;

g. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents;

h. the total VOC emissions from all molding materials, mold release materials and cleanup materials combined, calculated by summing the calculated emission rate of each molding material, mold release material and cleanup material, [(d.1.b)(d.1.e)(0.0000025*) + (d.1.c)(d.1.f.) + (d.1.d)(d.1.g)];

i. the hours P001 was in operation; and

j. the hourly VOC emission rate from all molding materials, mold release materials, and cleanup materials combined, calculated by summing the calculated emission rate of each molding material, mold release material and cleanup material, [(d.1.b)(d.1.e)(0.0000025*) + (d.1.c)(d.1.f.) + (d.1.d)(d.1.g)] / (d.1.i), in pounds per hour.

*Emission factor, for TDI only, based on MDNR Memo referenced in permit application.

[ORC 3704.03(T)]

(2) The permittee shall maintain monthly records of the following information:

a. the monthly VOC emissions from all molding materials, mold release materials, and cleanup materials combined, in tons; and

b. the rolling, 12-month summation of the VOC emissions from all moldingmaterials, mold releasematerials, and cleanup materials used in P001.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

[OAC rule 3745-31-05(D)]

(3) The permittee shall maintain monthly records of the following information:

a. the operating hours for each month; and

b. the rolling, 12-month summation of the operating hours.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the operating hours, upon issuance of this permit.

[OAC rule 3745-31-05(D)]

(4) The FEPTIOapplication for this emissions unit, P001,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/X x 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: Stoddard Solvent

TLV (mg/m3): 572.60 mg/m^3

Maximum Hourly Emission Rate (lbs/hr): 30 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.1

MAGLC (ug/m3): 13.6

The permittee, has demonstrated that emissions of Stoddard Solvent, from emissions unitP001, is calculated to be less than eighty percent 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).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(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 FEPTIO 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-monthrestriction on the hours of operation for this emissions unit; and

ii. allexceedances of the rolling, 12-month emission limitation for VOC.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)]and [OAC rule 3745-15-03(C)]

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

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], and Option A, Engineering Guide #70

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

f) Testing Requirements

(1) Compliance with the 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 Limitations

VOC emissions shall not exceed 30 lbs/hr and 79.5 tons per rolling 12-month period.

Applicable Compliance Method

Compliance with the hourlyemissions limitation shall be demonstrated by the recordkeeping requirements specified in term d)(1). Therolling 12-month emissions limitation shall be demonstrated by the recordkeeping requirements specified in terms d)(2) and d)(3).

The rolling 12-month emissions limitation is based on the average VOC emission rate of 22lbs/hr as specified in the permit application received on April 4, 2012.

g) Miscellaneous Requirements

(1) None.